

1 DEPARTMENT OF AGRICULTURE
2 AGRICULTURAL MARKETING SERVICE

3
4 7 CFR PART 205
5 NATIONAL ORGANIC PROGRAM (NOP)
6 ACCESS TO PASTURE (LIVESTOCK)
7 LISTENING SESSION
8 THURSDAY, DECEMBER 4, 2008
9 CHICO, CALIFORNIA

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11 The above entitled listening session was convened at the
12 University Farm Pavilion, 311 18 Nicholas Schouten Lane,
13 Chico, California, at 1:35 p.m.

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10 PROCEEDINGS

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12 MS. DALEY: Good afternoon. Welcome to the
13 University Farm. Good to have you here. And if you'd like to
14 find a seat, we'll go ahead and get started.

15 We are teleconferencing simultaneously, so our
16 speaker is going to be tied to the teleconference
17 microphone. And once we move through the presentation,
18 then we will move the teleconference microphone to the
19 platform, and that is where we would like you to make your
20 comments. And Richard is going to give you the rules of the
21 game. But make sure that you state your name and a little
22 bit about your program before you make your comments.

23 So with that, I'm going to go ahead and turn it over to
24 Richard Mathews.

25 MR. MATHEWS: Thank you, Cindy. First thing, I
26 would like to make sure that everyone here has signed in. If
27 you have not, please go over to the table. Make sure you

1 get signed in. Almost already wandered away without
2 standing by this other microphone.

3 The rules are that I'm going to first make a
4 presentation. And essentially, I'm going to read this
5 presentation. And the reason why I'm reading it is because
6 this is one of five listening sessions. I want to get the same
7 message out at all five of the listening sessions.

8 Once I've made my presentation, I'm going to open
9 the floor to all of you. And you're all invited to come up and
10 make a speech or a presentation to me about what it is you
11 either like or dislike about the rule. And what I would really
12 like is if you've got things that you don't like about the rule
13 that you tell us specifically what it is and what it would be
14 that you would like us to do as far as improving the rule.

15 I'm not going to put a time limit on your opportunity to
16 speak. I do ask, though, that if we have a lot of people who
17 want to speak that you be mindful of the fact that there are
18 others here that would like to give their thoughts on the topic.
19 And we're really looking for not a speech, but actually some
20 good critique as to what we can do to make this rule even
21 better where it needs to be made better.

22 So with that, I think what we'll do is we'll go ahead
23 and get started.

1 Currently the livestock production rules have four
2 sections. 205.236, origin of livestock, 205.237, livestock
3 feed, 205.238, livestock health care practice standard,
4 205.239, livestock living conditions. Those are the existing
5 sections.

6 This proposed rule has one little piece in it that deals
7 with 236. We'll deal with that very late in the presentation.

8 Section 205.237, we've proposed some substantial
9 changes there. And livestock health care practice standard
10 isn't addressed in the proposed rule, because we're not
11 proposing any changes there.

12 205.239, livestock living conditions, we'll spend a lot
13 of time on that, because that is an area where there's some
14 significant rewriting done.

15 205.240, pasture practice standard is actually a
16 proposed new section for the regulations. And as we go
17 through the slides here, you'll notice that the dark letters are
18 the existing language, and that the text in white will be where
19 we've made changes to make it new language.

20 205.237, livestock feed, the producer of an organic
21 livestock operation must provide livestock with a total feed
22 ration composed of agricultural products, including pasture
23 and forage, that are organically produced by operations

1 certified to the NOP, except as provided in 205.236 (a)(2)(i),
2 and if applicable, organically handled by operations certified
3 to the NOP.

4 For those of you that may not know, 205.236 (a) (2)(i)
5 is the provision that allows an operation that is in the third
6 year of transition to feed their animals agricultural products
7 that were produced on that farm during that third year of
8 transition.

9 Now, there's an exception to this. The old exception
10 reads except, that, nonsynthetic substances and synthetic
11 substances allowed under 205.603 may be used as feed
12 additives and supplements.

13 Now, we are proposing a change to that exception
14 that would read except, that, synthetic substances allowed
15 under 205.603 and nonsynthetic substances may be used as
16 feed additives and supplements, provided, that, all
17 agricultural ingredients in such additives and supplements
18 shall have been produced and handled organically.

19 One of the reasons for the change to the exception
20 was that you'll notice under the old exception it says
21 nonsynthetic substances and synthetic substances allowed
22 under 205.603. Some people have thought that
23 nonsynthetic substances were supposed to be listed in

1 205.603, and that's not the case. All the nonsynthetics are
2 allowed unless otherwise prohibited. So the first part of the
3 rewrite on the exception is to reverse that language so that's
4 clear that synthetic substances allowed under 205.603 and
5 nonsynthetic substances. Okay.

6 Continuing on. The producer of an organic operation
7 must not use animal drugs, including hormones, to promote
8 growth; provide feed supplements or additives in amounts
9 above those needed for adequate nutrition and health 0008
10 maintenance for the species at its specific stage of life; feed
11 plastic pellets for roughage; feed formulas containing urea or
12 manure; feed mammalian or poultry slaughter by-products to
13 mammals or poultry; use of feed, feed additives, and feed
14 supplements in violation of the Federal Food, Drug and
15 Cosmetic Act.

16 Those first six are all currently listed in the regulations
17 as I just read them. We've added two new ones which really
18 are not new language. They're just intended for clarification,
19 because these are already requirements within the
20 regulations. But we've added them under this paragraph.

21 Provide feed or forage to which anyone, at any time, has
22 added an antibiotic, or, prevent, withhold, restrain or
23 otherwise restrict ruminant animals from actively obtaining

1 feed grazed from pasture during the growing season, except
2 for conditions as described under 205.239(c).

3 During the growing season, producers shall provide
4 not more than an average of 70 percent of a ruminant's dry
5 matter demand from dry matter fed. Dry matter 0009 fed
6 does not include dry matter grazed from vegetation rooted in
7 pasture. Producers shall, once a month, on a monthly basis,
8 one, document each feed ration for each type of animal,
9 each class of animal's intended daily diet showing all
10 ingredients, daily pounds of each ingredient per animal, each
11 ingredient's percentage of the total ration, the dry matter
12 percentage for each ingredient, and the dry matter pounds
13 for each ingredient.

14 Document the daily dry matter demand of each class
15 of animal using the formula: Average weight per animal
16 pound times .03 equals pounds of dry matter per head per
17 day times the number of animals equals the total dry matter
18 demand in pounds per day.

19 Three, document how much dry matter is fed daily to
20 each class of animal.

21 And four, document the percentage of dry matter fed
22 daily to each class of animal using the formula: Dry matter

1 feed divided by dry matter demand in pounds per day times
2 100 equals the percent of dry matter fed.

3 Now, on that 70 percent requirement, that is actually
4 the first of 0010 three new requirements in this proposal.
5 The proposal only contains three really new provisions. The
6 rest of it is all intended to be clarification of the existing
7 regulations. The other two additions are the 30 percent that
8 we'll talk about later, plus the sacrificial pasture, which we'll
9 also talk about later.

10 205.239, livestock living conditions. The producer of
11 an organic livestock operation must establish and maintain
12 year-round livestock living conditions which accommodate
13 the health and natural behavior of animals, including those
14 listed in paragraph (a)(1) through (a)(3) of this section.

15 Further, producers shall not prevent, withhold, restrain, or
16 otherwise restrict animals from being outdoors, except as
17 otherwise provided in paragraph (b) and (c) of this section.

18 Producers shall also provide year-round access for all
19 animals to the outdoors, shade, shelter, exercise areas,
20 fresh air, water for drinking indoors and outdoors, and direct
21 sunlight, suitable to the species, its stage of life, the climate,
22 and the environment.

1 Old item two says access to pasture for ruminants.

2 We're proposing that access to pasture for ruminants be
3 reworded as follows.

4 Two. For all ruminants, continuous year-round
5 management on pasture, except as otherwise provided in
6 paragraph (c) of this section for grazing throughout the
7 growing season and access to the outdoors throughout the
8 year, including during the non-growing season. Dry lots and
9 feedlots are prohibited.

10 Old number three reads appropriate clean, dry
11 bedding. If the bedding is typically consumed by the animal
12 species, it must comply with the feed requirements of
13 205.237.

14 We have proposed to reword it to appropriate clean,
15 dry bedding. When hay, straw, ground cobs, or other crop
16 matter typically fed to the animal species is used as bedding,
17 it must comply with the feed requirements of section
18 205.237.

19 Shelter designed to allow for natural maintenance,
20 comfort behaviors, and opportunity to exercise; temperature
21 level, ventilation, and air circulation suitable to 0012 the
22 species, and reduction of potential for livestock injury.

1 Paragraph (b) currently reads the producer of an
2 organic livestock operation may provide temporary
3 confinement for an animal because of. We're proposing to
4 reword it as follows. Well, it's not all reworded this way. But
5 as you can see, there's some white inserts here.

6 The producer of an organic livestock operation may
7 temporarily deny a non-ruminant animal access to the
8 outdoors because of inclement weather; the animal's stage
9 of life; conditions under which the health, safety, or well-
10 being of the animal could be jeopardized, or risk to soil or
11 water quality.

12 Then we're adding a whole new paragraph (c),
13 because we've separated out the ruminants from the non-
14 ruminants.

15 The producer of an organic livestock operation may
16 temporarily deny a ruminant animal pasture under the
17 following conditions: When the animal is segregated for
18 treatment of illness or injury. The various life stages, such
19 as lactation, are not an illness or injury; one week prior to
20 parturition, birthing, parturition, and up to one week after
21 parturition; in the case of newborns for up to six months,
22 after which they must be on pasture and may no longer be
23 individually housed; in the case of goats, during periods of

inclement weather; in the case of sheep, for short periods for shearing; and in the case of dairy animals, for short periods daily for milking. Milking must be scheduled in a manner to ensure for sufficient grazing time to provide each animal with an average dry matter intake from grazing of not less than 30 percent throughout the growing season. Milking frequencies or duration practices cannot be used to deny dairy animals pasture.

Paragraph (d). Ruminants must be provided with: A lying area with well-maintained, clean, dry bedding which complies with paragraph (a)(3) of this section, during periods of temporary housing, provided due to temporary denial of pasture during conditions listed in paragraphs (c)(1) through 0014 (c)(5) of this section; yards and passageways kept in good condition and well-drained; shade in the case of goats, shelter open on at least one side; water at all times except during short periods for milking or shearing. Such water must be protected from fouling; feeding and watering equipment that are designed, constructed, and placed to protect from fouling. Such equipment must be cleaned weekly; and in the case of newborns, hay in a rack off the ground, beginning seven days after birth, unless on pasture,

1 and pasture for grazing in compliance with 205.240(a) not
2 later than six months after birth.

3 This paragraph (c), the only thing that we've changed
4 is the letter. That's because we've added a new (c) and (d).
5 So the former (c) is now (e). Or proposed (e), I should say.

6 The producer of an organic livestock operation must
7 manage manure in a manner that does not contribute to
8 contamination of crops, soil, or water by plant nutrients,
9 heavy metals, or pathogenic organisms and optimizes
10 recycling of nutrients.

11 Paragraph (f). The producer of an organic livestock
12 operation must manage outdoor access areas, including
13 pastures, in a manner that does not put soil or water quality
14 at risk; this includes the use of fences and buffer zones to
15 prevent ruminants and their waste products from entering
16 ponds, streams, and other bodies of water. Buffer zone size
17 shall be extensive enough, in full consideration of the
18 physical features of the site, to prevent the waste products of
19 ruminants from entering ponds, streams, and other bodies of
20 water.

21 205.240 is the new section, pasture practice standard.
22 The producer of an organic livestock operation must, for all
23 ruminant livestock on the operation, demonstrate through

auditable records in the organic system plan, a functioning management plan for pasture that meets all requirements of section 205.200 through 205.240. Pasture must be managed as a crop in full compliance with sections 205.200 through 205.206. The producer must develop and annually update a comprehensive pasture plan for inclusion in the producer's organic system 0016 plan. When there is no change to the previous year's comprehensive pasture plan, the certified operation may resubmit the previous year's comprehensive pasture plan.

The comprehensive pasture plan must include a detailed description of: Crops to be grown in the pasture and hay making system; cultural practices including but not limited to varying the crops and their maturity dates in the pasture system, to be used to ensure pasture of a sufficient quality and quantity is available to graze throughout the growing season and to provide all ruminants under the organic systems plan with an average of not less than 30 percent of their dry matter intake from grazing throughout the growing season.

As to describe the hay making system, the location of pasture and hay making fields, including maps showing the pasture and hay making system and giving each field its own

identity; the types of grazing methods to be used in the pasture system; the location and types of fences and the location and source of shade and water; the soil fertility, seeding, and crop rotation systems; the pest, weed, and disease control practices; the erosion control and protection of natural wetlands, riparian areas, and soil and water quality practices; pasture and soil sustainability practices; and restoration of pasture practices.

The pasture system must include a sacrificial pasture for grazing to protect the other pastures from excessive damage during periods when saturated soil conditions render the pastures too wet for animals to graze. The sacrificial pasture must be: Sufficient in size to accommodate all animals in the herd without crowding; located where soils have good trafficability; are well-drained; there is a low risk of soil erosion; there is little or no potential of manure runoff; surrounded by vegetated areas; and easily restored. Must be managed to provide feed value, and maintain or improve soil, water, and vegetative resources. Has to be restored through active pasture management.

In addition to the above, producers must manage pasture to comply with all applicable requirements of section 205.236 through 205.239.

1 Now we'll go over some definitions. The old crop
2 definition reads a plant or part of a plant intended to be
3 marketed as an agricultural product or fed to livestock. We
4 are proposing that the crop definition read as pastures, sod,
5 cover crops, green manure crops, catch crops, and any plant
6 or part of a plant intended to be marketed as an agricultural
7 product, fed to livestock, or used in the field to manage
8 nutrients and soil fertility.

9 The following are all new definitions that are included
10 to help explain the new language.

11 Dry matter. The amount of a feedstuff remaining after
12 all the free moisture is evaporated out.

13 Dry lot. A confined area that may be covered with
14 concrete, but that has no vegetative cover.

15 Feedlot. A confined area for controlled feeding of
16 ruminants.

17 Graze. To consume, or the consumption of standing
18 forage by livestock. To put livestock to feed on standing
19 forage.

20 Grazing is to graze.

21 Growing season. The period of time between the
22 average date of the last killing frost in the spring to the
23 average date of the first killing frost in the fall or early winter

1 in the local area of production. This represents a
2 temperature threshold of 28 degrees Fahrenheit, which
3 would be minus 3.9 degrees Celsius, or lower at a
4 temperature -- at a frequency of five years in ten. Growing
5 season may range from 121 days to 365 days.

6 Inclement weather would be defined as weather that
7 is violent or characterized by temperatures, high or low, that
8 can kill or cause permanent physical harm to a given species
9 of livestock.

10 Killing frost. A frost that takes place at temperatures
11 between 25 degrees and 28 degrees Fahrenheit, minus 2.2
12 and minus 3.9 degrees Celsius, for a period sufficiently
13 severe to end the growing season or delay its beginning.

14 We would define sacrificial pasture as a pasture or
15 pastures within the pasture system of sufficient size to
16 accommodate all animals in the herd without crowding,
17 where 0020 animals are kept for short periods during
18 saturated soil conditions to confine pasture damage to an
19 area where potential environmental impacts can be
20 controlled. This pasture is then deferred from grazing until it
21 has been restored through active pasture management.

22 Sacrificial pastures are located where soils have good
23 trafficability, are well-drained, have low risk of soil erosion,

1 have low or no potential of manure runoff, are surrounded by
2 vegetated areas, and are easily restored. A sacrificial
3 pasture is land used for livestock grazing that is managed to
4 provide feed value and maintain or improve soil, water, and
5 vegetative resources. It is not a dry lot or a feedlot.

6 Temporary and temporarily. Occurring for a limited
7 time only. For example, overnight throughout a storm,
8 during a period of illness, the period of time specified by the
9 Administrator when granting a temporary variance. Not
10 permanent or lasting.

11 The livestock definition currently reads any cattle,
12 sheep, goat, swine, poultry, equine animals used for food or
13 in the 0021 production of food, fiber, feed, or other
14 agricultural-based consumer products; or wild or
15 domesticated game; or other non-plant life, except such term
16 will not include aquatic animals or bees for the production of
17 food, fiber, feed, or other agricultural based consumer
18 products. This definition is actually in conflict with the
19 statute, because it excludes the aquatic animals as well as
20 the bees.

21 The -- we are proposing that the definition be
22 reworded to read exactly as it reads in the statute. So it
23 would read: Livestock. Any bee, cattle, sheep, goat, swine,

1 poultry, equine animals used for food or in the production of
2 food, fiber, feed, or other agricultural-based consumer
3 products; fish used for food; wild or domesticated game; or
4 other non-plant life.

5 This section here is only going to be changed if the
6 new section 205.240 is actually added. And that's because,
7 well, it reads right now produced in accordance with the
8 requirements specified in section 205.101 or sections
9 205.202 through 205.207 or 205.236 0022 through -- as it
10 reads right now, it's 205.239. So we would have -- if 240 is
11 added, we would have to change this. So it would say
12 205.240 and all other applicable requirements of part 205.

13 This is a rather controversial one. It has to do with the
14 origin of livestock. It's the only change for 205.236. And it is
15 intended just as a clarification of the existing language. It
16 does not address the larger origin of livestock issue which
17 will be handled through a separate rulemaking action. The
18 old language reads once an entire, distinct herd has been
19 converted to organic production, all dairy animals shall be
20 under organic management from the last third of gestation.

21 We are proposing, for clarification purposes, to read
22 once an operation has been certified for organic production
23 using the exception in paragraph (a)(2)(i) or (ii) of this

1 section, all dairy animals brought onto the operation shall be
2 under organic management from the last third of gestation.

3 Okay. That concludes the slides. 0023 Now I would
4 invite all of you to come up and comment on the provisions
5 that I've just covered. When you come up, please give your
6 name and tell us a little something about you. I'd like to know
7 whether you're a producer of beef, or a dairy producer, or
8 whatever your capacity might be. So come on up to this
9 microphone here and let's get the public part of this under
10 way. Let's not be bashful. I know you all came for a reason.
11 Thank you.

12 MR. HARRISON: My name is –

13 MR. MATHEWS: Okay. That's got to be turned on.

14 MR. HARRISON: My name is Rick Harrison. And I'm
15 a partner in Pete's Valley Cattle Company. We raise organic
16 grass-fed beef for Northern California. Our ranch was
17 recipient of the Society of Ranch Managers Environmental
18 Stewardship Award in California in 1999. And in 2006, we
19 won the National Wetland Stewardship Award from the U.S.
20 Fish and Wildlife.

21 The only reason I bring that up is to represent we are
22 good stewards of the land as well as of our livestock.

1 As a rancher, I'm offended that the federal
2 government feels a need to tell me that I need to provide
3 water to my livestock as well as calculate on a monthly basis
4 their diet. I would submit that the rancher is better equipped
5 to make day-to-day decisions on the care of their livestock
6 than the government is.

7 I'd like to comment that I think the organic rules need
8 to differentiate between beef cattle production and dairy
9 production. It doesn't make sense to have the same rules
10 govern beef production and dairy production. There are
11 different cultural practices managed for different
12 commodities.

13 I'm a cattle rancher, so my comments will have to deal
14 with cattle production. The government cannot legislate the
15 best farming practice on a national level. The U.S. is too
16 large and too diverse. Practices which are sound in certain
17 parts of the country are ridiculous in others.

18 My recommendation is to draft rules or guidelines that
19 boost entrepreneurial spirit instead of making it impossible to
20 comply. For example, the proposed requirement for
21 preventing ruminants from entering waterways. Our ranch
22 has literally hundreds of seasonal streams, reservoirs, small
23 ponds, and other bodies of water. It would be impossible

1 and cost prohibitive to try to fence those cattle out of these
2 areas.

3 Another example is the proposed requirement for
4 sacrificial pasture. That may be a good solution for certain
5 operations, but our operation doesn't need a sacrificial
6 pasture. In fact, I'm unaware of any fields that we have that
7 meet the requirements and criteria for developing one. It's
8 naive to believe that the cattle can be brought to market in
9 the United States without being fed store feed in any
10 meaningful way. Access to growing pastures is just simply
11 not available year-round.

12 Under the proposed rule, feedlots will be prohibited.
13 Where would you propose that we feed the cattle? In the
14 sacrificial pasture maybe? Confinement is the issue. Every
15 animal in the United States is confined by the Atlantic Ocean
16 on one side and the Pacific on the other. That's a ridiculous
17 statement. Nobody would imply that those animals are
18 confined. But are they confined? Is an animal in a 1,000-
19 acre field confined? How about a 100-acre field? How about
20 10 acres? Confinement boils down to space per animal.

21 We cannot get away from feeding store feed. And
22 having organic meat production is a significant part of the
23 industry. In order to efficiently feed, store fed animals need

1 to be confined. So to require access to pasture that doesn't
2 exist because of a non-growing season or because pastures
3 are non-existent, trying to comply with an organic regulation,
4 that's been over-grazed is a farce.

5 My recommendation would be to come up with a
6 space per animal where animals -- for animals being fed
7 store feed. The organic industry is viewed as the fastest
8 growing section of agriculture. However, the University of
9 Iowa Extension Office published an article that said that less
10 than one-tenth of one percent of these cattle were certified in
11 2005.

12 My concern is these regulations will be so invasive
13 that only the very small producer will be willing or able to
14 comply with it. And the U.S. organic beef market will remain
15 a booming industry. So our responsibility is to develop
16 regulations to not only ensure food quality, but to foster the
17 entrepreneurial spirit and encourage producers to participate
18 and grow this market.

19 MR. MATHEWS: Can you come back to the
20 microphone for a moment please?

21 You made a comment that you would like us to
22 consider a space requirement in the feedlot. Do you have
23 any recommendation on that?

1 MR. HARRISON: We've got one. A minimum of 500
2 square feet per animal. It can be bunch space or whatever.
3 But it needs to be a space requirement so everybody isn't --
4 500 square feet.

5 MR. MATHEWS: So you would advocate for allowing
6 feedlots, but with a space requirement of 500 square feet per
7 animal?

8 MR. HARRISON: Yeah. And I would do more
9 research on it before I say 500 is the number. But I think
10 that's what it boils down to, to be able to have an industry
11 that we can grow and compete with.

12 MR. MATHEWS: Okay. Could you follow your verbal
13 comments up with a written --

14 MR. HARRISON: Yep.

15 MR. MATHEWS: -- clarification on what you've just
16 addressed?

17 MR. HARRISON: Yep.

18 MR. MATHEWS: Thank you.

19 MR. HARRISON: You want a recommendation for a
20 space requirement as well as my written comments?

21 MR. MATHEWS: Okay. Sure.

22 MR. HARRISON: Okay.

1 MR. MATHEWS: Thank you. Don't get me wrong.
2 I'm not going to require everybody to send me a written
3 comment. But there may be times when I ask for a little
4 additional clarification that would be beneficial for us.

5 Anybody else? Man. You all drove a long ways.
6 Tony? Come on up. And you're welcome to line up if you
7 would like.

8 MR. AZEVEDO: My name is Tony Azevedo. I've
9 been an organic dairyman for 0029 about 15 years. I'm also
10 president of the Western Organic Dairy Producers Alliance.
11 I know you don't want any speeches. But how about an
12 apology? For about a year and a half, I've said in public that
13 nothing with any kind of teeth was going to come out of
14 USDA. Actually, I used a little different language than that.
15 But I –

16 MR. MATHEWS: Are you telling me this one has
17 teeth?

18 MR. AZEVEDO: This one has teeth. And I was
19 absolutely elated when I seen that there was an interest to
20 try to -- an attempt to try to make a level playing field. So
21 you definitely have raised my hopes.

22 Unfortunately, it may be just a little too restrictive for
23 me to continue my way of life. So what we've done at the

1 Western Organic Dairy Producers Alliance, along with NOPA
2 and MAPA, is we've taken comments from farmers from
3 across the United States and have used your format with
4 some adjustments. But it's not quite ready to present. And
5 the reason is, is because we feel that any changes that we
6 do to your proposal should be backed by documentation
7 similar to what this gentleman said.

8 And just to reinforce what he said, a lot of our farmers
9 in Wisconsin have so many of those little streams and
10 gullies. So that's a very major issue to them too.

11 But if I'm not mistaken, the ending of the comment
12 period is the 23rd.

13 MR. MATHEWS: Yes.

14 MR. AZEVEDO: And we should have all our
15 documentation ready to present by that time. And I certainly
16 want to thank you for restoring my faith in USDA. Because I
17 really lost faith that there was nobody out there that really,
18 you know, gave a damn.

19 Are there any questions?

20 MR. MATHEWS: No. MR. AZEVEDO: Okay.

21 MR. MATHEWS: Thanks, Tony.

22 MR. BURROUGHS: Good afternoon. My name is
23 Ward Burroughs. I'm from Full Circle Dairy and California

1 Cloverleaf Farm in Vallejo, California. The northern San
2 Joaquin Valley. We seasonally have 500 cows on each
3 dairy. One is just completing its fourth organic year and the
4 other one is in its first organic year.

5 I want to thank the NOP for giving all of us the
6 opportunity to speak at this listening session and publicizing
7 its proposed rule regarding access to pasture. I also thank
8 the NOP for ensuring that grazing is a major, enforceable
9 criteria of this -- this NOP new pasture rule.

10 I urge the NOP to adopt the revisions put forth by the
11 food farmers that Tony just talked about and others in order
12 that this pasture rule will be doable for organic dairymen, has
13 to be doable, and livestock farmers, but less enforceable by
14 certifiers in the NOP.

15 This food farmers revised rule will become a rule to
16 which all of us will have to adjust, but that with these
17 revisions, will level the playing field across the country for
18 the organic dairy industry.

19 This revised rule will ensure the integrity for the
20 organic seal for both producers of organic livestock product
21 and sustainability for my family's organic dairy farms.

22 I am sure that our dairies in the central valleys are
23 meeting the new standards of a minimum of 120 days

1 grazing and 30 percent intake from the grazing season. In
2 our dairy, they meet 100 percent of the feed needs for 180
3 days and about 50 percent of their forage for about 100
4 days. Both scenarios far exceeds the 120/30 percent
5 requirement.

6 In our mind, it's important that grazing season not
7 growing season become one of the foundations for this
8 proposed rule. Because it is during a grazing season when
9 animals can actually graze that dry matter intakes can be
10 measured and documented for the organic system plan.

11 It is important for the NOP, the government agency to
12 understand that California organic dairy producers already
13 have management plans and water polling plans mandated
14 by the state and regional Water Quality Control Board, a
15 government agency, as well as air quality plans mandated
16 by the Air Quality Board, another governmental agency.

17 For our dairies, most sacrificial pastures and required
18 access to outdoors during inclement weather would certainly
19 violate the state Water Control Board mandates. It is very
20 important that the NOP does not put California or any other
21 organic dairyman in a position that they would have two or
22 more masters regarding these kinds of environmental
23 matters.

1 Finally, I urge the NOP to adopt our food form
2 revisions to this new pasture rule and move forward quickly
3 to an access to pasture final rule. We look forward to the
4 publication of a new, separate, simple proposed rule for the
5 origin of livestock that eliminates the existence of two
6 pasture systems and establishes a system for organic
7 replacement animals.

8 In other words, to level the replacement playing field
9 so that all the dairymen operate under the same set of rules.

10 Thank you.

11 MR. MATHEWS: I have a follow-up for you.

12 You were mentioning the state water quality. Do you
13 have to put together a plan on how you're going to meet that
14 requirement?

15 MR. BURROUGHS: Absolutely.

16 MR. MATHEWS: Would it then be logical for us to
17 address the water quality issue, rather than saying that the
18 pasture -- or that the water bodies have to be fenced off, but
19 what if we had in the rules that you have to have as an
20 attachment to your organic system plan a copy of your water
21 quality plan --

22 MR. BURROUGHS: Sure. That would work.

1 MR. MATHEWS: -- that you've already worked up for
2 somebody else?

3 MR. BURROUGHS: All of us are required to have --

4 MR. MATHEWS: So would that be reasonable?

5 MR. BURROUGHS: At dairies, that's true. Other
6 species may not have the same setup.

7 MR. MATHEWS: Okay. Could you come up to the
8 microphone, sir. And restate your name, please.

9 MR. HARRISON: Rick Harrison. That would not
10 work on a beef cattle ranch, because we're not subject to the
11 same water quality issues that the dairies are. And so
12 you've got 400 cows over 6,000 acres. It would be virtually
13 impossible to fence off, not to mention that's where they get
14 their water. So you're kind of defeating the purpose
15 providing them water if you're fencing them out of it.

16 MR. MATHEWS: Okay. So what I'm hearing is that
17 for dairy farmers, including their water plan might work. But
18 for beef producers, that wouldn't, because we're talking
19 much larger acreage with a lower density of animals.

20 Now, I saw Albert shaking his head, so he must have
21 a comment. Come on up and speak on that please, Albert.
22 And after you answer this issue --

1 MR. STRAUS: I was going to start with -- my name's
2 Albert Straus. I have a certified organic dairy in Marin
3 County above San Francisco. We were the first certified
4 dairy in 1994 west of the Mississippi River.

5 Just the water quality, we're under a variance from the
6 water quality that we have to meet a variance every year.
7 We have to submit a form, and that we've inspected
8 everything and document with pictures. We do have --
9 what's it called. California -- what's the -- Environmental --
10 California Dairy Quality Assurance Program that a lot of us
11 are in. Most of us. But the valley's totally different from the
12 coast, and there are different regions regarding the Water
13 Quality Control Board. I don't think the federal government
14 wants to get involved in it. Anyway, let me just thank you for
15 coming here.

16 MR. MATHEWS: So just before we move into that --

17 MR. STRAUS: Go ahead.

18 MR. MATHEWS: What you're -- are you saying, then,
19 that we don't need to address it in the rule because it's
20 adequately addressed through the state in some way?

21 MR. STRAUS: Actually, where we are on Tomalas
22 Bay, we have requirements from the regional Water Quality
23 Control Board since 1976. We're not allowed to have

1 anything go into the waterways of the state. We have
2 inspections. We have -- we're very scrutinized. And I don't
3 think that anything that the NOP does will address the issue.

4 MR. MATHEWS: Okay. So it sounds like what you're
5 telling me is that the fencing off of the waterways within our
6 regs is not necessary to fulfill the current requirement that
7 the farmers not do anything to contaminate the water,
8 because the state already is taking that kind of action to
9 enforce.

10 MR. STRAUS: The state, and I think EPA. I don't
11 know about the rest of the country. But there's very strict
12 environmental regulations that are being enforced. We've
13 actually fenced off all our creeks and waterways. It's been
14 25, 30 years ago. So for us, it's not an issue. But I don't
15 think putting it into an organic regulation, a water quality
16 issue, is where it should be.

17 MR. MATHEWS: So it's -- I think what I'm hearing is
18 that the requirement that the operation not foul the soil or
19 water through heavy metals or manure or whatever is
20 already adequately addressed in the regulations.

21 MR. STRAUS: I think so.

22 MR. MATHEWS: Okay. So you can go ahead and
23 proceed with your planned presentation.

1 MR. STRAUS: Yes. As much as it is.

2 These new regulations or these new proposed
3 regulations, in my mind, are arbitrary, discriminatory, and
4 unfair. I think that these regulations would make operations
5 have inhumane animal practices. That some of the
6 proposals are illegal practices that are required. The
7 sacrificial pastures, going back to the water quality. We
8 couldn't put -- in our soil conditions, we couldn't have a
9 sacrificial pasture. We'd be shut down.

10 In my mind, this proposal has nothing to do with the
11 purpose of having organic products for farming. If these
12 proposals go through, it will put us and a large portion of
13 small organic dairies out of business.

14 My question is, what is the minimum requirement to
15 make the existing regulations enforceable? I had Mark
16 Castel from Cornucopia say all existing regulations are
17 adequate. But then I heard that they're not enforceable or
18 something else. But so -- and my question is, what is the
19 minimum required to make it enforceable.

20 I have a suggestion that someone touched on. We
21 could use -- best manage the practices developed by NRCS,
22 by the county, as a way to manage pastures. Best manage
23 our pastures. If these regulations go through, I think

1 consumers and competitors will be turning in producers, and
2 we're going to have a nightmare, and I don't think the
3 organic industry is going to survive. Thank you.

4 MR. MATHEWS: Do you want me to answer your
5 question about the enforceability?

6 MR. STRAUS: Yes. That would be great.

7 MR. MATHEWS: Okay. Well, I can't totally agree
8 with Mark Castel. We wouldn't be here putting together this
9 proposed rule if we had all we needed in order to enforce the
10 rules. Okay? I believe that there is enforceability in the
11 existing rule.

12 However, I also believe that we can tighten that up
13 through some more regulations that help clarify what the four
14 existing provisions require.

15 As you all know, there's the definition for pasture.
16 There's the requirement that feed come from pasture.
17 There's the requirement that the pastures be managed to
18 control parasites. What is it. There's another one in there
19 someplace. Oh. Access to pasture. That's really where the
20 biggest problem is, the access to pasture. But I would argue
21 that clearly, access to pasture includes putting the animals
22 out on the pasture. Because why would you have to control
23 for parasites? Why would you have a requirement that they

1 get food from pasture? Why would the definition talk about
2 nutritional value if they weren't supposed to be on pasture?
3 So yeah. You can argue that.

4 But I think the problem is that we've got some sharp
5 lawyers out there who make life pretty miserable for the
6 people who are trying to do the enforcement. And so if we
7 can do some additional tweaking to the regulations to clarify
8 what we mean by access to pasture, we'll have better
9 enforceability. So that's -- there needs to be some additional
10 language to define what access to pasture is.

11 MR. STRAUS: And inclement weather. In our case,
12 there's four months of rain. So I think we have a lot of rain
13 all at once, and then it's dry for the rest of the year. So I
14 really -- I had to really point out that there's vast differences
15 between the different regions of this country.

16 MR. MATHEWS: Yeah. And inclement weather is a
17 tough one for us. And that's why we've tried to bring in a
18 definition of what inclement weather is. And it may not be
19 satisfactory. So we're looking for comments on how we can
20 take that proposed definition of inclement weather and make
21 it better. Because it's not just snow and ice, and it's not just
22 rain. I mean, it could be temperature and humidity. But how
23 do we as the regulators define what is inclement weather?

1 So it's very difficult. So we came up with a definition, and
2 we're looking for help to make sure we got it right.

3 Gentleman in the back standing up there waiting to
4 comment.

5 MR. BERETTA: Thank you. My name is Doug
6 Beretta. I'm a third generation dairyman in Sonoma County
7 north of San Francisco Bay.

8 We have just transitioned our dairy to organic in 2006.
9 Maybe one of the reasons that we did that, we kind of felt
10 that we were somewhat of an organic dairy all along. We
11 are pastured by 220 acres of irrigation. We milk about 250
12 cows.

13 Reading through these regulations, the biggest one
14 that stands out to me is denying animals to pastures or
15 locking cattle up in free-stalls.

16 In 1974, my grandfather built the first free-stall on our
17 facility. Prior to that, we had cows on pasture year-round.
18 Laid on shaving piles outside. I went back through some of
19 our records that my dad still had, and our haul rate at that
20 time was over 50 percent of the earth. The cows on our soil
21 cannot handle 30 inches of rain. They were walking through
22 their bellies in mud to and from the barn daily. We used to
23 have to use a pressure hose to wash the cows and a

1 sprinkler head to get them clean. Our milk quality was not
2 what it is today.

3 Ten years ago we built another free-stall facility to
4 house our milk cows in the rainy season. We also were able
5 to bring our heifers out of the mud and into a free-stall barn.
6 This is things that the dairy industry in California, throughout
7 the United States has done to improve the health of the
8 animals, the health of the environment, and also water
9 quality. So these are things in these new regulations that
10 would be prohibitive.

11 I have -- our soil is sandy loam with a clay base. I
12 went through before I came over here today and just looked
13 at my pathways that would take my cows. If we had to do
14 this to a sacrificial pasture, I figured I would have to haul in
15 at least 200 loads of 20 yards of rock to get them there at
16 \$400 a load. It would be about \$80,000 this would cost me.
17 But by doing this, I would be at fault because of where our
18 ranch lays. We are in wetland in our county. We cannot
19 haul in more than 50 yards of fill a year without getting a
20 permit. Our ranch has three endangered flowers and also
21 endangered salamander.

22 We utilize the pasture when we can in the growing
23 season. Or actually, I would say in the grazing season.

1 Right now, our cows are out in pasture. This is the first time
2 that I can ever remember cows on pasture in December.
3 We have usually had ten to fifteen inches of rain. And our
4 cows are in free-stall barns for a reason. There is no feed
5 value in that pasture today. They're out there. You can see
6 their manure is loose. The pasture goes through them. If
7 we were able to feed more than 70 percent of dry matter
8 from other feeds right now, those cows would be losing
9 weight. They would not be producing the milk that they are
10 today.

11 So I think there are some things in here that need
12 some changes. I did sit down last night and go on the
13 website and read some of the comments from the New York
14 listening session. And I think those were brought up by
15 veterinarians about .03 percent of what they will eat.
16 Because a lactating cow can eat more than .03 percent of
17 their body weight to produce her milk and to maintain her
18 health.

19 So I would like to really see that this comment period
20 could be extended at least 30 days, if not 60 days, with
21 putting pressure on a lot of people to sit down and not be
22 able to run their business. I've been sitting here reading this
23 70 pages of this Federal Register for the last three or four

1 weeks and I still haven't gotten through it. And every time I
2 read it, I find something that I think will affect us as a dairy.
3 So I would really like to see the comment period extended
4 and get some nutritionists and veterinarians and the industry
5 people to look at the recommendations that would help
6 everybody in the United States. Thank you.

7 MR. GIACOMINI: My name is Daniel Giacomini. My
8 background is that I'm a -- my profession is an independent
9 animal nutritionist, specializing in dairy management and
10 nutrition, which I've been doing for approximately 25 years. I
11 have a master's degree in nutrition and science from the
12 University of Illinois and a bachelor's from Cal Poly. And I
13 grew up on a dairy farm in Ferndale, which if you travel the
14 world, I've been told by people who have done this, it's
15 probably one of the premier pasture areas in the world.

16 I'm a member of the National Organic Standards
17 Board, which gives me an opportunity to understand the
18 writing of regulations, certification, inspection, and the fact
19 that intent does not mean anything unless it is what the
20 words say. It is what the words say that matter. And that
21 helps me understand, and I think maybe brings a different
22 perspective that I would not have had two or three years
23 ago.

1 I understand the concept of pushing the bar as high
2 as possible. And I understand the need for bringing
3 everything into a proposed rule to get it through all the other
4 different branches of the government so that they approve
5 that and you get that clearance. You have something to
6 come down to. And it's going to be very hard to raise above
7 that. So I understand why the recommendation was written
8 the way it was.

9 But I have always been -- I'm not in favor of a large
10 part of this regulation. And I've always been opposed to the
11 30/120 principle. I believe it would take the organic industry
12 right to the edge of a cliff, which a lot of people would not
13 survive it.

14 Unfortunately, the way this proposal is written, it
15 grants the wives and children and the kitchen sink and
16 everything else and just -- it would put a tremendous amount
17 of the industry out of business, and it would not -- and I don't
18 think it's where we really want to go.

19 Regarding the proposal, it really isn't a sacrificial
20 pasture and access to pasture proposal. It's a supplemental
21 feeding restriction proposal. It's limiting what we can feed.
22 What the farmers can feed their cows over the course of the
23 year. It's assuming that the cows are out there getting that

1 through grass. Well, that's not really what the proposal is
2 saying. It talks about 30 percent in the preamble. But when
3 it gets to the regulations, it's talking about 70 percent
4 supplemental and 3 percent body weight.

5 The way it's written, it's regionally based. It's been
6 said before it's biased -- it's system biased. And
7 unfortunately, it is written to reward lack of knowledge as
8 opposed to rewarding knowledge. It's written to encourage --
9 it should be written to encourage best management practice,
10 where it's not encouraging that. It is too much and it's too
11 encompassing. And when you get into things like mandating
12 when you feed baby calves, it's going -- it's just gone too far.

13 My recommendation on the first part would be to
14 simply go back and pull out all of the things that are not
15 pasture. Set those aside. Do it in a separate document. Do
16 the -- the seven days for calves. Do the origin of livestock.
17 Or since you're already looking at doing origin of livestock,
18 fix it all at once. But I don't think a piecemeal approach on
19 those or putting something in -- if this had been a three-page
20 document, that would have been fine. But when it's a 90-
21 page document, there's going to be some part of it that does
22 not get the adequate discussion that it deserves and

1 consideration of what it really means to be -- to be applied
2 into the rule.

3 For example, you require an exercise lot, but a dry lot
4 is prohibited. I don't understand what that means if it's not a
5 pasture. You require shade on pastures. I could only
6 imagine what some certifiers would require of these dairy
7 farms to implement a requirement of having shade on their
8 pastures. I don't know if they're going to be making them
9 build barns out there, or shade facilities, or planting trees, or
10 what. But it's an effect of what you put in the regulations that
11 needs a chance to be better vetted than that.

12 You also have included the issue of feed additives
13 and feed supplements on the carriers needing -- if they're
14 agricultural product, needing to be organic. That's fine. And
15 it's what you have been saying for probably at least the last
16 three years in guidance documents. However, just since
17 that has come out, we have certifiers saying they are going
18 to be requiring -- even though yeast is not considered an
19 organic product, they are going to require yeast, which is not
20 really feed but a digestive aid, 10 grams .02 pounds.
21 They're going to be requiring that this needs to be grown on
22 organic substrata. That's what the certifiers are already
23 saying.

1 To follow this to the extreme, without consideration of
2 what it means, through my own research last summer, there
3 is no compliance for vitamin D in a dry form to go into a dry
4 minimum package that exists. It either has a preservative or
5 it has an ag -- modified agricultural carrier. And you're
6 talking vitamin D, using different things in the requirement.
7 You're actually talking, when you look at how much vitamin
8 D you have, about five or six zeros before you get to a
9 number after the decimal point. To carry the requirements to
10 those kinds of extremes are not, I don't believe, what the
11 program intended. But they're going to be the
12 consequences unless we have a chance to set it aside and
13 really discuss what the implications are going to be.

14 MR. MATHEWS: So Dan, you would recommend that
15 that particular issue be sent to the board?

16 MR. GIACOMINI: I think a lot of things that you've put
17 in here need a better discussion and a better vetting.
18 Whether you decide as the program to do that through an
19 ANPR or as a proposed rule that's more specific to a specific
20 topic or through the National Organic Standards Board I
21 think is up to you. That's -- I'm not going to tell you, you
22 know. You have more experience on what the implications
23 are of going different routes.

1 The -- it amazes me in going through the
2 recommendations, I believe even in the Federal Register
3 version, there's four or five pages that talk about the cost of
4 building a fence. But yet when we're talking about a pasture
5 regulation that you're setting to a factor of dry matter intake,
6 not one paragraph in that document discusses the variations
7 that affect dry matter intake. Not one sentence in that
8 document justifies using 3 percent of body weight as a factor
9 for dry matter intake.

10 National Research Counsel requirements for dairy
11 cattle, I have a copy, has six pages on dry matter intake. It's
12 not a simple matter. It's 2 to 4 plus percent of body weight.
13 Three is a good average. But it's like every average. You're
14 almost always wrong. You're going to be close. You'll be in
15 the ballpark, but you're always wrong.

16 When you limit 70 percent intake of that number -- I
17 have dairies that I've worked with who the cows are
18 consuming 3.8 percent. The way this is written where they're
19 locked in a formula of 3 percent of body weight and 70
20 percent of that what those cows are actually consuming in
21 dry matter intake, we would only be able to supplement 55
22 percent, not 70, because of the formula that you force on us
23 to utilize.

1 I believe that we are -- you're too restrictive on dry lots
2 and feedlots. But I understand what you did. The industry --
3 part of the industry have come and said, "We want 30/120.
4 We want dry lots. We want no feedlots." And you gave it to
5 them. But again, it's too restrictive. You already have -- the
6 same people that have been clamoring on you to outlaw dry
7 lots are saying, "Well, that doesn't include the little lot next to
8 the barn where the heifers are, does it?" And you've said,
9 "Yes, it does." So you've given them what they want, and
10 now they're realizing that it's not the same when it's actually
11 applied in regulations.

12 Sacrificial pastures may be something that works in
13 Wisconsin in the summer. Not out here. It's going to tear up
14 winter pastures to be ruined for the whole season. You
15 allow hay making, you have to allow silage. Homegrown
16 silage on the winter forage is what a lot of dairymen are
17 putting up. And not allowing that -- it's not taking anything
18 away. If anything, hay making is taking more away from
19 pasture, because it's intended to be made later in the
20 season, whereas silage is intended to be made early in the
21 season when the pasture is abundant.

22 My prediction, if this rule were to go through, is two
23 things. Number one, we would see -- on paper, we would

1 see an increase in size of organic dairy cows in this country
2 by over 10 percent in the first three years on paper. And I'm
3 not saying they're lying. They're trying to feed their cows and
4 survive. We'll have 1,600-pound Holsteins and 1,200 pound
5 Jerseys, just so they can meet the requirements and trying
6 to come close to feeding them. Because it doesn't make
7 sense to put a regulation of having cows out on grass when
8 the grass isn't growing. And they come to the end of the
9 year, and they're faced with one of three options. They can
10 either starve their cows, they can be non-conformant, or they
11 can go out of compliance and/or fudge some numbers. And
12 anybody that loves their cows and loves this business really
13 is only faced with one option, and it's not a good one.

14 And if the regulation and the efforts to put this in and
15 put more behind pasture is based on getting rid of the
16 capots, whatever number they're claiming, 15, 17, 20,
17 whatever it is, it doesn't make sense to write a regulation that
18 would get rid of the five that the people don't want, maybe, or
19 the 15 that the people don't want, maybe, and bring another
20 couple hundred to a couple thousand into potential
21 noncompliance and the huge potential impact on the integrity
22 of the program when that hits the press.

1 But I do support the efforts, what the program has
2 done in taking this not just as a pasture issue, but as animal
3 welfare, and recognizing that cows exposed to being on
4 pasture is as important a factor as cows chained up in
5 extension barns for six months out of the year. I applaud
6 you for bringing that into the picture.

7 Specifically regarding 30/120, it just doesn't work. It's
8 not a verifiable figure. There's just too much play. Too
9 much wobble. And people may come up here and say, "We
10 can do it." Well, in my time of being in the organic business,
11 and I've been doing this for quite awhile, if you ask most
12 organic dairymen how big a dairy is too big to be organic,
13 there's one answer, and they almost all have the same
14 answer. "It's one more than I have." And it's the same thing
15 right here. "Well, if I can do it, that's what the regulations
16 should be. Cut it off right below where I am." And that is not
17 where we should be making -- the way we should be making
18 federal regulations, especially when they're starting to
19 become restrictive regulations. That's just -- you know.
20 Somebody in New York is just under somebody in
21 Wisconsin. Just, you know. Somebody, wherever they are,
22 is not the way we should be making regulations.

1 Keep pasture cropped. I think that's a good aspect.
2 Keep it as an increased part of the organic system plan.
3 Keep the recognition that this is more than just pasture.
4 That this is an aspect of overall animal welfare to what we're
5 trying to do.

6 And regardless of how they do it, and without going
7 against what the gentleman said from the beef operation,
8 you know, sometimes we just do need to remind people they
9 need to have water wherever they keep their cows.
10 Because it's -- too often they go into an operation and say
11 that's not it.

12 I think it is worth noting that NOPA does allow a
13 differentiation between production livestock and slaughter
14 livestock. And I don't know where it was in the regulation
15 rulemaking process that those got blended together. But
16 NOPA does allow a differentiation. It was also in a report to
17 Congress as a result of the Harvey lawsuit and decision.
18 The program itself recognized the difference between cows
19 that are certified organic or certified organic cows and cows
20 that are certified to produce organic milk. Those are two
21 different things. And I don't know that we necessarily need
22 to run the two of them together and to eliminate totally --
23 completely eliminate that difference.

1 Finally, to give you an offer of what I would propose,
2 my proposal is based on a premise that I believe is true is
3 cows like grass. If cows have the opportunity to go out on
4 grass, they are going to do it. I would support keeping crop
5 pastures as a crop. I think we can just say you have to have
6 a minimum of 120 days of grazable pasture, whether it's on
7 edible forage or supplements over the course of a year.

8 From what I hear, a far better number to restrict what
9 some of these abuses are is to -- in the regulations you
10 talked about animals per acre and you discussed why that
11 doesn't work. That is not the full -- the way that it should be
12 looked at. The way it's looked at across all species is animal
13 unit per acre, which is 1,000 pounds of body weight. I think
14 if we looked somewhere along the line of 3.0 animal units
15 per acre for the lactating herd on pasture that is accessible
16 to the lactating herd and four animal units per acre for all the
17 animals in your operation over six months old for all the
18 pasture that is under your management and control with an
19 allowance for individual operators to work with their certifiers
20 and justify a higher number than that.

21 There are situations -- situations where they might
22 have a big, huge pivot irrigation system. They can put it --
23 it's nice weather. They can put on a lot of water and run six

1 cows per acre. And if they can justify that this really works, I
2 don't see anything in violation or principles that violate that
3 and should make that prohibitive.

4 We need to allow silage again off the pasture ground
5 and to make the whole thing tied up together. Keep the gate
6 open. If there's grass out there, cows are going to go, and
7 nobody is going to overfeed in the manger for it to go to
8 waste. It's just too expensive.

9 MR. MATHEWS: Okay. Stay there. I'm going to have
10 to try and remember all the questions I had for you. Okay.
11 You have said that you disagree with the 30 percent.

12 MR. GIACOMINI: Yes.

13 MR. MATHEWS: You agree with 120 days of grazing
14 season. You suggest 3.0 animals per acre.

15 MR. GIACOMINI: Animal units.

16 MR. MATHEWS: Animal units per acre. So we'd
17 have to define animal units.

18 MR. GIACOMINI: That's defined in the industry and
19 NRCS.

20 MR. MATHEWS: Okay.

21 MR. GIACOMINI: It's defined far better than, you
22 know, your inclement weather, which starts to sound like the
23 definition of torture out of the Justice Department.

1 MR. MATHEWS: Let me think. Maybe I did consult
2 them.

3 So it's your belief that we could better define what
4 access to pasture is and ensure that animals are getting
5 adequate feed through a rule making that set three animal
6 units switched from growing season to grazing season. Is
7 that going to solve the problem that we have with people
8 filing complaints all the time about, "How does that solve it
9 for 0060 us?"

10 MR. GIACOMINI: If you're limited to three animal
11 units per acre and you have 12,000 cows, it's pretty hard for
12 that to be pasture that is accessible to that herd.

13 MR. MATHEWS: Okay. But when they –

14 MR. GIACOMINI: Because those 12,000 cows would
15 be -- if they're Holsteins, that would be what? Probably
16 about 16 or 17,000 -- 17,000 animal units.

17 MR. MATHEWS: Okay.

18 MR. GIACOMINI: I don't think you can pasture it
19 reasonably. I don't think anybody can try to convince a
20 certifier even through an attorney that a couple thousand
21 acres is an accessible pasture.

22 MR. MATHEWS: Okay. How do we ensure that
23 there is a nutritional value coming off of that pasture? I

1 mean, I've seen some pretty horrible pastures. And I was on
2 one farm where there were some really beautiful pastures,
3 but the cows weren't on them. What they were doing is they
4 were taking the hay off of it and bringing it up to another
5 pasture where it was probably, I would say, 80, 85 percent
6 bare ground. And what little vegetation there was was
7 awfully short and wasn't going to survive. And they were
8 bringing the hay in. Yet this operation had been certified
9 with having pasture. So how do we get around that?

10 MR. GIACOMINI: Well, I don't know if what I've
11 proposed is perfect. I do know that we have situations, you
12 know, where they have the pasture now, and there's other
13 ones that are doing it through green shop, which also is not
14 in compliance. But just to say that the animals need 30
15 percent of their diet dry matter intake from pasture also
16 doesn't do it either. It really doesn't. I mean –

17 MR. MATHEWS: Isn't it true that over the course of a
18 year that that really amounts to only about 10 percent?

19 MR. GIACOMINI: Then make that the requirement. If
20 you want to say that over the course of a year, you need to
21 have -- the animals' diet needs to have been 10 percent dry
22 matter intake from pasture, then make that the requirement.
23 That gives the farmer the flexibility of managing that number

1 to their own best management practice. But right now you're
2 encouraging a very crooked pencil all over the place.

3 MR. MATHEWS: Okay. Let me ask you this. If we
4 did require that, how would we measure it? I'm not trying to
5 put you on the spot. I'm trying to digest this and understand
6 what you're asking.

7 MR. GIACOMINI: Well, that's one of the problems
8 with what we have right now is you have it tied into that 3
9 percent formula. Cows at the beginning of lactation, lowest
10 body weight, they need the highest energy density to have a
11 decent milk consistency over the course of lactation. We're
12 already punishing the cows. And the cows that utilize a
13 tremendous amount of pasture are potentially being overfed.

14 Any time you come up with one set of numbers, I can
15 guarantee you it's not going to be perfect. And how do you
16 verify what you're -- what you're doing now? What I'm
17 proposing -- there's no way to verify what you're currently
18 doing. But the one thing people can do, even if they have to
19 add it all up and divide by four, most certifiers can count up
20 the number of cows being fed, you know. And if they have
21 charts to tell acres and -- you know. Because the inspector's
22 only out there one day a year anyway. What they're doing
23 the other 364 -- it would raise your hair for you to hear how

1 many times I've been told, "I only need to be organic one
2 day a year." The day the inspector is there.

3 MR. MATHEWS: And I don't doubt that one bit.

4 MR. GIACOMINI: But all the other proposals are not
5 solving that problem. What I'm just trying to -- what I've tried
6 to find is a solution around numbers that I think are ultimately
7 not verifiable. Because dry matter intake does change body
8 weight. Does change intake into the requirements. Cows do
9 change. And I don't think it's in anybody's best interest to
10 present -- put in the regulations something -- a situation that
11 really at the end of every year puts the livestock rancher in
12 the situation of being non-compliant, starving his cows, or
13 cheating. That's not a wise place to put a regulation.

14 MR. MATHEWS: And that's not what we want to do.

15 MR. GIACOMINI: And that's what it would do. And,
16 you know, I'm -- and, you know, you hear a lot of people.
17 And I'm sure you heard it up in New England and up in the
18 Midwest. "We can do 50, so 30's okay." Well, 30 is a big
19 pile of grass. 30 percent is a big pile of grass. Most cows,
20 that's going to be between 60 and 120 pounds of wet grass
21 for those cows to be consuming. That's a lot of grass. And if
22 you want to divide that over 365 and say 10 percent, do that

1 and give the farmers the opportunity to manage that within
2 their own system.

3 MR. MATHEWS: But am I right in that 10 percent?

4 MR. GIACOMINI: Yeah. Yeah. 30 over 120 would
5 be 10 percent over the year. Yeah.

6 MR. MATHEWS: Okay.

7 MR. BANSEN: Jon Bansen. I'm a dairy farmer.

8 Third generation dairy farmer from Mammoth, Oregon. My
9 grandfather and 0065 father and my brother are all dairymen
10 down in Ferndale where Dan's from.

11 I'm going to come at this from probably a place where
12 Dan wouldn't agree with, coming from a dairyman's
13 perspective. I think instead of a nutritionist -- I probably
14 won't make a lot of fans. I don't use a nutritionist. Because
15 cows aren't designed to take in forage. And my job as a
16 dairyman is to give them as much high quality forage I can
17 with supplemental graze.

18 I do like the fact that this rule is going to bring grazing
19 as a greater -- a greater aspect of organic dairy farming. I
20 think it's one of the basic principles of organic dairy farming.
21 Has been from the beginning. I do believe that there's some
22 tweaking that needs to be done. And it's been talked about
23 already here by several of the farmers, the big issue

1 probably being the water quality. We face that in organic as
2 well. Apparently, the wet climate's out here on the West
3 Coast. And frankly, we just would not be allowed to have
4 our cows out. Like Rich said, we have -- all of our rain pretty
5 much comes in four months. And that would cause some
6 water quality issues. You know.

7 I've looked all over my farm. And that sacrificial
8 paddock -- my whole farm would be a sacrificial paddock by
9 the time the winter got over. But the rainfall is something
10 that would not cover the cows out there. I have a paddock
11 which allows me to get out early in spring and stay out late in
12 the fall as possible. But there's the winter periods that just
13 would be a problem for water quality for cow health.
14 Especially, you know, cows make mud in a hurry, even if you
15 have a nice drain. Sacrificial paddocks, they make mud in a
16 real big hurry. So that would be one of the issues that I think
17 really needs to be addressed in this.

18 The -- then that really deals with the year-round
19 access. I think access needs to be made for the grazing
20 season not year-round. I do applaud having that minimum
21 standard, you know. And I really believe that 30 percent,
22 120 days is a minimum, you know. I think it's something
23 pretty much everyone in the entire country can meet if they

1 put their mind to actually setting up their system to do so. I
2 do believe there's probably some things -- some specific
3 things like cleaning the water troughs weekly. On a
4 rotational grazed farm, the cows are going to be in that same
5 pasture every 21 to 28 days. Probably doesn't make a lot of
6 sense cleaning the water troughs when the cows won't be
7 there for four weeks. So I would like -- you know. I would
8 like to see some of those specific provisions that I think is
9 better dealt with through management.

10 Probably the calf hay at seven days, probably that -- I
11 don't see why that should be in there. And I also do believe
12 that replacement should be on a one-track system where
13 everybody's in the same -- we have the same regulations.
14 So no matter how you brought your herd into organic, it
15 should be -- replacement should be for the last third of
16 gestation.

17 MR. ALEXANDER: My name is Blake Alexander.
18 Like Jon and Dan, I'm also originally from Ferndale. I'm
19 actually fourth generation dairy farmer. My wife and I have
20 dairy farms in both Humboldt County and Del Mar County.
21 And, you know, we've been grazing our cows literally for four
22 generations. And this -- these requirements aren't anything
23 new.

1 I'd like to first go on record as supporting the food
2 form proposal. That isn't actually officially out today, but it's
3 good. It's going to support the 120 and the 30 percent, and I
4 think that was the intention all along.

5 I've been sitting here reminiscing, thinking back to --
6 well, Dan mentioned that we ought to send this out to, you
7 know, or possibly refer this out away from your program,
8 Richard, to somewhere else. To the MLSB board. And I
9 said, "Why didn't they have that four years ago?" But I know
10 they did. I went to Washington, DC twice. Talked to them
11 about this issue. And I've been out here patiently waiting for
12 something from you. And congratulations to you that it
13 finally came out. And it does have teeth in it. And I believe
14 the purpose of the teeth are for the certifiers, not necessarily
15 us as the dairymen. And we have a little bit of baby in the
16 bath water here where the teeth come out. We've been here
17 at least four years saying, "Please give us some teeth." And
18 I'm here in the room, and the comments are saying, "Oh, no.
19 Not so many teeth." And I want to go on record by saying I
20 like these teeth.

21 In addition to the farming we do out here on the coast,
22 I've been involved in an operation in Texas for quite a few
23 years that's becoming more famous all the time, actually with

1 7,000 cows, in Dalhart, Texas. And when they first started,
2 they came to me to ask that I be involved so that I could help
3 them basically design a system on a piece of virgin land that
4 would accommodate a legal grazing dairy.

5 And my philosophy has always been we're doing all
6 this for the consumers. That's why we have these rules and
7 that's why we agree to comply with the rules, so we can go
8 to the consumers and say, "Please pay us extra for our milk,
9 because it stands for something." Then you have to ask
10 yourself, "What do the consumers really deserve? What do
11 they really have a right to require us to do?" And I've asked
12 myself that question for years. And the only answer I can
13 come up with is the consumers have a right to get what they
14 think they are getting. And we all advertise our milk with the
15 pitch of cows on grass. And so we need teeth in these rules
16 to get these cows on grass. And those teeth need to be
17 maybe a little simpler. More simply stated. When the 70
18 percent came out, you took that and you twisted it around
19 and you flipped it upside down and that was wrong.

20 Because -- because of the reasons that Dan
21 explained, on these higher producing herds, cows were
22 going to be eating way over 3 percent of body weight. And
23 now you've asked us to really limit their feed as far as

1 supplemental feed and push them out on grass when there's
2 going to be times of year that it's not out there. And so that
3 doesn't work. It literally doesn't work. I do support the 30
4 percent going the other way absolutely for 120 days as a
5 minimum. And if we can work into some sort of a
6 requirement of animals per acre, I think there's benefit to
7 that.

8 We as a national group of dairymen, you know, pre-
9 food form conversations, used to talk about that. And we
10 were -- somewhere around three cows was the number.
11 And I was participating on a conference call. At the time, I
12 had well over four cows on one of our dairies. Four cows
13 per acre. And I think it's a legitimate field. However, we're in
14 an area where we have premiere grass. We can kind of get
15 away with it. That's something -- there can be some leeway
16 there with a certifier to do that. But we wouldn't want a
17 certifier to allow six cows per acre or ten. And I've been to
18 Texas, and I'm very familiar with the numbers, and six
19 doesn't work.

20 So we -- anyway, my comments are -- oh. On the
21 sacrificial pasture. Again, where we're located in the north of
22 -- kind of right in the upper north corner of California, right on
23 the ocean. And there's issues there with the sacrificial

1 pasture. We just can't do it. It tears up things real fast. We
2 get about 100 inches of rain a year. We're about a mile from
3 the ocean and it's super wet. The other problem finding the
4 grazing season or the growing season is you use these frost
5 dates. And I'm not really even sure we have frost dates
6 where we're at because we're by the ocean.

7 MR. MATHEWS: That gives you the 365.

8 MR. ALEXANDER: Right. It goes right to 365. And I
9 do know that we have individual days where we have 10
10 inches of rain, so that's a problem.

11 I'd like to flip over now to another side of our
12 business. We also have grass finished steers. And I've got
13 200 steers ready to go to a meat buyer who's moving really
14 slow. So I'm holding them in one particular group, just last
15 week, for instance. And these steers are out grazing on
16 grass 100 percent right until the last day. And they would be
17 on a sacrificial pasture.

18 Now, I looked around our farm. That day we had 17,
19 1,800 cows out, but they're in and out, and they're not
20 getting 100 percent. They're feeding on the grass. These
21 steers are 14, 1,500-pound steers and they're out there
22 tearing the heck out of a field. And they can ruin a 40-acre
23 field in hours.

1 Literally in hours. And we couldn't even get in and out
2 of that field. Say after a week of that, we have to move them
3 immediately. So it does create problems for us to have the
4 real McCoy in terms of grass. So I believe that's the end of
5 my comments. Thank you.

6 MR. MATHEWS: Thank you.

7 MS. HULTGREN: My name is Suzy Hultgren. And
8 we have a dairy down in Merced County. I'm going to try to
9 organize my thoughts, because they weren't real organized.
10 And most everybody's said quite a few things that we did.

11 I'm a third generation pasture based dairy. We dairy
12 about -- we have about 300 cows on 400 irrigated acres.
13 And we have grazing land and hills to winter some of the
14 heifers on. And we also -- I realized, as a gentleman was
15 talking, that we also -- we've certified beef also, although our
16 market hasn't been great. So -- but my point, I guess, is that
17 my grandfather raised -- basically we were conventional for
18 45 years. And we did survive. We didn't go through mass
19 production, you know. Longevity. You're slow and steady.
20 You let a cow be a cow.

21 And some of the thoughts that I had is that I hear
22 sometimes that -- it's almost like some of the industry is
23 pushing as close as you can to be conventional without

1 being conventional. And organic is a different style of raising
2 a cow. And I appreciate the USDA for, like I said, putting
3 teeth into this pasture rule. We all know what access to
4 pasture is. Access left the rule open for leaving the gate
5 open. You know. I know that's not what the intent is. But
6 just like kids. If you say -- you limit what their directions are,
7 they're going to bend it as far as they can.

8 So I would -- I would say that pasture should not be
9 accessible. It should be utilized. So I appreciate the fact
10 that you put those rules in there. I do agree that there's a lot
11 of places in those that, you know, you went overkill. And I
12 think again as a parent, you've got to put a lot of things in
13 there so the laws don't get broken.

14 I would encourage that they have to be on pasture.
15 And I think the 30 and the 120 days, obviously everywhere is
16 different. I wish that we had that much rain. I wish that that
17 was a problem that there was mud. We're stuck in the
18 middle of a drought. And my only concern would be the
19 inclement weather would be drought. It may be too hot, or I
20 may not have any irrigation water. So -- I told you all my
21 thoughts were going to go here and there, so bear with me.

1 But it is possible. My grandfather did it for 45 years,
2 and we made a living being conventional. It wasn't big and
3 fancy, but we did it.

4 The unit per acre would concern me because the
5 variability from county to county. Management, how you're
6 treating that ground, what you're planting, or overseeding, or
7 how you're doing it. So that would be hard to -- that would
8 be hard for you guys to manage, I would think.

9 And like the gentleman said, cows would rather being
10 grazing, you know. That's what they're intended to do. And
11 when you turn them out, that's what they're going to do. And
12 if there's no grass, they're still on pasture. They'll find
13 something to eat. But obviously, the utilization is what we
14 need to do.

15 Ward mentioned that we're already, in California, and
16 don't know if that's going to be nationwide, but we're already
17 doing so much documentation for the Water Quality Board
18 that when we first started having to do that, it was very
19 similar to the organic plan. So we're repeating again a few
20 fine changes. And I'd encourage you to look at those. And
21 like you said, either attach it or know that you're doing a
22 water plan. Because we're already pretty regulated with that
23 anyway. I think that some of our bookkeeping things that

1 you're requiring in that wording is just overkill, because we're
2 already doing it. We're doing it for the organic plan, for the
3 Water Quality Board, the Air Board, everybody.

4 The beef production, I guess I didn't even think about
5 beef production. And like the gentleman said, I think it
6 should be separated. I'm doing both. And when I read it, I
7 thought that applied to dairy. Because you can't really be a
8 beef producer if you're not giving them enough acreage.
9 Won't make money if you've got to supplement the cows all
10 the time. The mama feeds them, and you can tell if they're
11 not producing.

12 So I guess I appreciate USDA doing that. It's not --
13 our experience with government is not -- we're farmers doing
14 these things. So I appreciate putting some teeth in this too.
15 Because if the only reason to be organic is to get as close as
16 you can to conventional and still get the premium for organic,
17 I don't think that is what the consumers want. I think the
18 consumers want the picture of the cows grazing. And it's a
19 marketing tool. And I appreciate there's more time to
20 comment. Because I've read about some better organized
21 thoughts. So thank you.

22 MR. MATHEWS: Thank you.

1 MR. LANGSTON: Hi. My name is Wayne Langston.
2 And I assist in helping a group of certified organic beef
3 producers in Northern California and Southern Oregon who
4 collectively market their beef cattle under organic grass fed
5 beef.

6 Some of the producers I'm speaking for, some of the
7 comments have already been expressed. I'll try not to be
8 repetitive, but bring up some additional concerns.

9 In the proposed ruling there's language specifically in
10 part 205 -- 205.2 where your terms are defined. There's a
11 term that is not defined in there, that term being confined,
12 and what is going to constitute confinement. As you look in
13 your definitions, your definition of feedlot is a confined area
14 for the controlled feeding of ruminants. If you look closer
15 into this, actually, this definition could also apply to
16 management intensive grazing programs of which when you
17 apply that definition, it could be a controlled area. A
18 confined area for the controlled grazing of ruminants.

19 I think the question comes up is would this form of
20 confinement be acceptable as opposed to feedlot form, or is
21 there really a difference in the two. I think when you look at
22 management intensive grazing programs, the efforts that
23 they've made to not only preserve but enhance the

1 environment and optimize -- not maximize but optimize the
2 production from these areas, some of the most progressive,
3 open-minded management programs we have out there
4 today are recognized through stewardship programs alike.

5 I think that our concern is that the language in this
6 ruling should not serve to deter the efforts of the very
7 producers dedicated to this type of production.

8 Another concern would be having to do with the
9 inclement weather issues and ability of producers to care for
10 the well-being and welfare of their animals, mainly focusing
11 on producers geographically located in higher elevations
12 which in periods of time can accumulate large amounts of
13 snow which cover the very areas in question. Again, we
14 don't think that the language in this ruling should negatively
15 affect those producers and their efforts to care for their
16 animals.

17 An additional point that has been brought up as far
18 as, some repetitively, with water quality issues, how they
19 affect dairies, and what the California dairies are already
20 subject to.

21 In addition to that, one of the things that came out a
22 year ago in October of '07, USDA already issued a definition
23 for what is acceptable as far as grass fed or grass finished

1 product. So the question comes up is it really necessary to
2 include language in the organic program from that very same
3 thing, and brings up the question of what is the real reason
4 or purpose for the ruling.

5 In conclusion, I would like to bring up something that
6 relates to what's already been said here today. We've heard
7 from many California certified organic dairy producers how
8 this rule will either affect them positively or negatively.

9 Everything based from science to emotions, all of what's
10 necessary. But this rule does not say dairy. This rule says
11 livestock. And it will encompass every species of livestock
12 raised organically. So it will affect many different species in
13 many different ways.

14 One thing we have learned in California, California
15 has been under a lot of one-size fits all regulations for years.
16 Everything from mountain lions, to most recently restricting
17 what roofing materials can be used on roofs, to try to limit
18 the amount of air-conditioner use, when in some of the areas
19 in northeastern California we need the roofing materials to
20 preserve heat in the wintertime. California is not a one-size
21 fits all situation. If California is not a one-size situation, the
22 nation is not a one-size fits us all. And that's why the
23 language in this ruling would prevent a lot of producers to

1 effectively utilize the resources they have in their geographic
2 location. Thank you.

3 MR. MATHEWS: Stick around a second. I didn't
4 quite follow you when you were talking about the grass fed
5 rule as it relates to the organic rule. Can you go back over
6 that?

7 MR. LANGSTON: Sure. The grass fed rule, the
8 USDA issued the grass fed rule back in October of 2007, in
9 which is a definition of someone going to use the term grass
10 fed or grass finished would have to comply with. A lot of this
11 is very similar to what you're proposing in the organic rule.
12 So the question is, if the two are actually going to be like,
13 then wouldn't we, through this ruling, effectively make all
14 organic producers grass fed producers, and is it really
15 necessary to have two similar rulings.

16 MR. MATHEWS: Okay. I guess my reaction would
17 be that yeah, they would be grass fed under the organic.
18 But they would still be very different from the conventional.
19 Because the grass fed doesn't address the other criteria for
20 being organic. So they would still be different. But thank
21 you.

22 MR. MOORE: Hello. My name is Charlie Moore. I'm
23 from Denver, Colorado. I'm one of the owners of Maverick

1 Ranch Organic Meats. We are a family-owned and operated
2 food processing and marketing company in Denver. We are
3 one of the elder founders of the meat movement back in the
4 '80s. Also a fourth generation cattle rancher from western
5 Idaho, a 40-acre cattle ranch along the Snake River. We
6 have 20 inches of rainfall, which is very different from some
7 of the rainfall that we hear around certain parts of California
8 and Oregon.

9 My perspective is a little bit different in that I'm coming
10 from the perspective of a marketer and manufacturer. I visit
11 grocery stores at least twice a week, sometimes three times
12 a week on average, maybe 250 days a year in stores. Talk
13 to meat managers, what represents meat quality, what
14 they're looking for. One of the primary things consumers are
15 looking for in organic products, not only meat but dairy
16 products, poultry, swine, et cetera, is some basic parameters
17 of no antibiotics, no growth hormones, no pesticides, and no
18 GMOs. The majority of the consumers are not aware of
19 differences in feed type operation. What they're looking for
20 is quality in their meats and safety in their meats.

21 I think the guidelines that are drafted here are too
22 broad. They're one size fits all. We really need to break
23 down the guidelines between a dairy operation and a beef

1 cattle operation. And even within beef cattle operation, there
2 are distinct differences between grass fed product and grain
3 fed product. And we all know most of the grain feed product
4 in this country comes from feedlots.

5 I work with seven of the top ten largest grocery chains
6 in the country. Folks like Costco, Safeway, Kroger, Walmart,
7 et cetera. These are operations today that will not accept --
8 some of them will not accept some of the -- some of the big
9 ones I just mentioned will not take a strictly grass fed animal.
10 I've tried until I'm blue in the face. Folks are saying if
11 consumers are going to spend \$10 to \$20 a pound, maybe
12 even \$30 a pound for a beef tenderloin, then that product
13 must be of exceptional quality. And the only way to achieve
14 that is a capot-type operation.

15 I realize today there have been numerous, call them
16 bad players in the organic industry who have ruined it for the
17 majority of other people, because they take advantage of the
18 way the NOP is written today. So the need for defining
19 pasture and pasture access is necessary and needed.

20 I propose that we take a better approach to defining
21 what is a capot or a feedlot as it pertains to organic
22 standards. And we have attempted to do that with these
23 changes and these rules. The consumer -- there's two types

1 consumers out there for that beef. And I think the standards
2 that are -- that are being proposed are reasonably
3 acceptable. I will make more comments in writing so they're
4 more specific in detail.

5 I think that this is a fast moving train. I think that there
6 has been a call and request from numerous parties for an
7 extension for that timeline. For this deadline. I would
8 propose a 60 to 90-day extension for the December 23rd
9 deadline so more people can wrap their arms around the 90-
10 page document and fully understand it. Because if you're
11 not a lawyer, it can take you a tremendous amount of time of
12 rereading to understand the finer nuances in this.

13 As it pertains to grain fed cattle, for a typical choice
14 animal, it's going to have a minimum of 120 days on feed in
15 a confined feeding area. The ability of an animal to go out
16 and graze in open pasture behind a concentrated feed box,
17 yes. The cattle are going to spend more time out grazing.
18 They do want that green grass and other forages when
19 available. But they also want, when given the free choice,
20 the ability to be at that feed box as well, and need a
21 concentrated silage diet of corn and other feedstuffs.

22 The described days are going to be different for
23 feeding in one area of the country versus the other, as well

1 as what weather is happening. If an animal is having to
2 spend a lot of its energy usage in maintaining heat, it's not
3 going to be converting that energy into meat production
4 itself. It's going to be keeping itself warm. So I think that
5 there's a need for describing a broad spectrum, giving the
6 individual certifiers the ability to work with their operation and
7 what is happening in their local area for feeding.

8 So my fear is that we will take this too far, and that
9 grain feeding will be eliminated from the ability of organic
10 production. I think we risk losing a consumer segment who
11 wants a high-quality product. And don't get me wrong. I
12 think strictly grass finished product can be high quality too.
13 But consumers have different tastes. There is a distinction
14 between grass and grain.

15 So I recommend we take more time and delineate
16 what would be more acceptable between a capot and a
17 feedlot. And people maybe outside the industry consider
18 that a negative word. I do not. I ascribe that a feedlot would
19 be a necessary tool for high quality meat production. But we
20 need to understand what is acceptable and what is not so
21 we can protect the natural resources, we protect the
22 watershed, and we protect the animals and the lifestyle of
23 the family farm itself.

1 So I will be making more comments in writing. And I
2 will also be in Amarillo, Texas on Wednesday at the next
3 listening session.

4 MR. MATHEWS: Okay. I'll see you there.

5 MR. MOORE: Thank you.

6 MR. MATHEWS: Thank you.

7 MR. GRIFFIN: My name is Mike Griffin. I'm a feed
8 man for Dairy Processing above San Francisco. And as a
9 company, we have not settled on a company stance
10 response. We plan to send something. And I wanted to give
11 you a heads-up though. We're having an area-wide
12 meeting of all our water regulators and getting them to
13 respond so you'll get a taste. And again, there's all the
14 programs. It's incredible. I commend you for trying to wrestle
15 with this.

16 Secondly, talking with certifiers, they've all
17 acknowledged the difficulty in value of pasture. They've all
18 said, "Can you teach us?" I was working for a year with
19 three different certifying agencies. "Can you look at a
20 pasture and tell us what it's worth?" I've never raised a cow.
21 Very difficult issue. But between the 30 percent dry and the
22 70 percent -- or 70 percent coming from 3 percent of body
23 weight is kind of a claim that's a difficult issue.

1 And the last thing is a personal comment. When the -
2 - we're out if it goes to 365, 30 percent as a dairy community
3 organic. If it defaults to the 20 percent, 130, we're really,
4 really, really going to have to stretch. That's why internally,
5 we're still trying to decide. But I will never forget after one of
6 the conventions, a dairyman called me on April 22nd and
7 said, "My cows feet are breaking down. I don't care what the
8 Water Board says." And I was driving to town, and
9 everything was burned up dry. So I hope if you move to the
10 next stage that there is some kind of accountability for
11 drought conditions, you know. Once again, who's going to
12 decide? Who helps everybody with this issue? But to make
13 that an ironclad rule, the 120, 30 percent, we will have a
14 difficult -- because there is no ground water in our areas
15 north of San Francisco. And there's a huge consumer base
16 down there. So we'd sure like to keep that going. Thank
17 you very much.

18 MR. KENNEDY: Hi. I'm John Kennedy. And I'm an
19 independent dairy nutritionist. And I grew up in grazing area
20 south of Ireland and came to this country 20 years ago and
21 have been pushing grazing conventional and organic cows
22 ever since. And I really applaud the direction that is going. I
23 think there's definitely need for some teeth in this

1 organization. And I spend my days working numbers on dry
2 matter intakes, and I have opinions on probably every line of
3 your proposal. And I really want to just pick two items that I
4 consider to be the least workable of what you're proposing.

5 And one that has been mentioned here a couple of
6 times is this 3 percent of the dry matter intake. And it's just -
7 - it's so unrealistic for what I see our current dairy cows
8 eating right now. Especially the well-taken care of, well-
9 managed animals are. And -- and part of what we do as
10 animal husbandry people is to take care of these animals so
11 well that they do their best and are comfortable, and
12 numbers as close to 4.5 as possible. So if we put a grazing
13 requirement based on the negative aspect of that, which is
14 limiting 70 percent of what we can supply from non-grass
15 sources, then we really are working against what we're doing
16 in taking care of our animals correctly.

17 So in the need for putting in some sort of numbers,
18 how would you consider the proposal where if you want to
19 have 30 percent of the dry matter, then do 30 percent of that
20 3 percent intake, which is 1 percent of their body weight
21 coming from pasture. It's a much similar rule. It's a much
22 easier way. It's exactly what you're trying to accomplish, but
23 it's just working with real numbers rather than reversing the

1 numbers. So 1 percent of the body weight from pasture
2 during whatever period of time you consider to be required
3 seems to be a much easier number to work with. It's getting
4 exactly what you're looking at, and it gives us -- as animal
5 husbandry people, it gives us the opportunity of still taking
6 care of -- if the animal is hungry, we can still give her what
7 she needs, but she still has that base of grass in the number
8 of days that you require.

9 Now, the number of days, and I believe you have a lot
10 of comments, and hopefully all my clients will give you
11 written comments as well, but I think you have a lot of
12 comments on whether this 120 days will work for certain
13 areas or not. And we in the northern part of California have
14 been grazing cows for 150 years in some major meat
15 producing areas. But they limit to grazing only when nature
16 provides us with grass, which in some cases aren't 120
17 days.

18 And in that respect, I want to put again a little bit of a
19 vote towards the idea, which I'm sure you'll see coming
20 towards you on written documents, where we are allowed to
21 mold the pasture and let it sit in place and consider that to be
22 grazing, even though it has withered and it has -- it has laid
23 in its place in what we call a wind row. But we'd like you to

1 consider that as an extension of the grazing season.
2 Because if we let it stand and let it dry and wither, we're
3 looking at basically a stick with a head on it, which will not
4 allow us to produce healthy feed for those animals. So if we
5 have less than 120 days, say 100 days or 90 days of
6 beautiful green grass, the climate that our irrigation here
7 allows us to grow, and we want to meet these rules, in order
8 to do that and consider -- and let the animals out and graze
9 them without hurting their health, we would like you to
10 consider this option, which is wind rowing the feed. Letting it
11 lie in the pasture and then let the animals come and graze
12 that. Because the feed then is of a higher quality than if it is
13 left standing.

14 MR. MATHEWS: Okay. So what I'm hearing is that
15 the requirement that it be standing grass rooted in pasture,
16 you think that it would be good to allow that standing grass
17 to be cut and later grazed by the animals?

18 MR. KENNEDY: Yes.

19 MR. MATHEWS: Okay.

20 MR. KENNEDY: Yes. I think that -- that should not --
21 whatever wording you end up with, and please let that be
22 considered grazing.

1 MR. MATHEWS: Okay. We'll consider that. The
2 reason for the language of rooted in pasture was to prevent
3 people from bringing grass from other locations to put into
4 the pasture. Exactly the example I gave earlier where
5 somebody was, you know, putting a mound basically on bare
6 ground and cutting their grass off of the pasture and then
7 taking it to the area where they were calling it pasture. But it
8 was just a large dirt field. So yeah. Go ahead. Go on.

9 MR. KENNEDY: And then the restriction that we
10 have only the animals -- you know. We do have to comply
11 with water quality in this area. And so there are many very
12 good days where the grass is available to us. But because
13 our animals will end up completely burying their hoofs in the
14 ground, we have to keep them indoors off that. Indoors off
15 the pasture or wherever. And again, proper husbandry has
16 developed over the last hundred years where it is to the
17 benefit of the animal to have them off the pasture. And so
18 that then when we -- when we let them back out, we do have
19 the ability to have a variation in the dry matter intake.

20 So again, when you come up with the final wording,
21 my request is that make sure that the words average dry
22 matter intake be within your ruling. And I believe that that's
23 probably going to be there. But it's not necessarily going to

1 be exactly 1 percent body weight per day, every day. It
2 could be –

3 MR. MATHEWS: Yeah. As it's currently drafted, it is
4 an average over the growing season.

5 MR. KENNEDY: Right. And I'm supporting your use
6 of that word. Because that has to stay in there as well, I
7 think.

8 And the second point that I consider to be totally
9 unworkable within the ruling as you have currently is the
10 sacrificial pasture. And I think that we will get into some
11 major animal welfare issues. If anybody was to see some
12 animals out in what I have seen back in the '60s in Ireland to
13 be considered sacrificial pastures, it would be considered
14 nothing short of an animal welfare issue. You know. We
15 have to take care of our animals. And some of the type of
16 rainfall that was described here earlier doesn't even have to
17 be that drastic. Half an inch of rain for three days and you
18 leave an animal in a sacrificial pasture. And so consumers
19 would consider that to be good husbandry, just the
20 appearance of the animal alone.

21 In conjunction with that, the higher producing animals
22 that we have right now, there is nothing organic about that. I
23 think the healthier animal we have, the better producing

1 activity that they have. So the idea that all your -- they're
2 giving too much milk is an anti-organic statement. It's not.
3 And so again, those two points. The point of the 3 percent
4 being unworkable with a suggested reversing to 1 percent
5 instead, and then the idea that a sacrificial pasture is
6 something to look for for the future. I think it's a very
7 aggressive type of a solution to a problem that I know you
8 have to find an answer to. But a sacrificial pasture would not
9 be it. And then the other 100 points I'll leave until later.

10 MR. MATHEWS: Okay. I assume the other 100
11 points you're going to put into writing for me?

12 MR. KENNEDY: Yes.

13 MR. MATHEWS: Okay. Because I'm looking forward
14 to hearing or reading more on the two points you did bring
15 up. Okay. Thank you.

16 MR. McGLOCHLIN: Hello. I'm Gary McGlochlin from
17 Petaluma, California. And I've been a grazier for about 25
18 years. My wife got us in the dairy business about 12 years
19 ago as a pasture based seasonal dairy. And I guess we've
20 been organic for two. I can't remember.

21 Everybody said stuff that I wanted to say, some things
22 that I would never say. I want to reiterate what was said.
23 Two things. The first is to mention mineral feed. We go

1 typically five months, some years seven to eight months
2 without rain. Feed left in the field stays in good quality. It's
3 grazable. We don't have the opportunity to irrigate. Our
4 growing season is in the winter. But we do have to mitigate
5 rain. In all the years I've been working with pastures, I've
6 even referred to some Irish journals. There are techniques
7 out there. We've tried to use a lot of them. Sacrificial
8 pastures was never a technique. I don't know where that
9 came from. But it was surprising to see that written down.

10 A couple of other notes. One is I think as usual, it's
11 typical for bureaucratic systems, we're going to add more
12 detail. I'm not a person that likes detail. Probably why I
13 don't even bother with a nutritionist. I don't even like thinking
14 out of the box, because I don't like boxes. A whole lot of our
15 innovations come from letting people figure out things. Don't
16 restrict them too much, take away tools. I've always used
17 pastures. We're a productional dairy organic. It's the
18 cheapest way to produce milk. We'll continue to do that. If
19 for some reason they don't allow us to produce organic milk,
20 we'll probably use pastures and produce milk. I think one of
21 the problems is the certifiers and the certifying agencies. It's
22 easier to blame them, because they're probably not here
23 today.

1 MR. MATHEWS: There's at least one here.

2 MR. McGLOCHLIN: Okay. I realize it would be nicer

3 to give them more rules that would be more enforceable.

4 But one point of note, my certifier has never visited me

5 during the grazing system. That would be a small change

6 that would help them to understand. I think we have to look

7 at annual systems. I've never done -- and goals and

8 problems. I've never done the same thing twice, because

9 I've never had the same conditions two years in a row. We

10 have experienced a typical dry summer. We have droughts.

11 And we have what one farmer called a mud drought. It was

12 so wet that nothing grows, because we have saturated soil.

13 All those we have to cope with every year.

14 One other area that I was concerned about is we

15 always add more recordkeeping. I think that's become more

16 and more a burden on smaller farms. Because the amount

17 of recordkeeping for 50 cows is not one-tenth of the

18 recordkeeping you have for 500 or 5,000 cows. It becomes

19 a burden for people to do several other jobs besides

20 recordkeeping.

21 I think any certifier of any pasture has no local

22 knowledge coming out of the geological area they're

23 certifying. I don't think we have to give them numbers that

1 no one can verify. It's always easier to fill out some slips
2 after the fact and make it appear a paper trail. But actually,
3 when you walk a dairy, you know what they're doing if you
4 know something about agriculture.

5 And I think that's just about it. So I'm glad you were
6 here, though. Because otherwise, I would be still talking to
7 myself in my pickup driving around after having read all of
8 this information.

9 MR. MATHEWS: Thank you. And I'm fighting the
10 temptation to ask you who your certifying agent is. So don't
11 tell me.

12 MS. ALLAN: Hi. Thank you for the opportunity to be
13 here. I'm Robin Allan. I work for CCP, a certifying agency.
14 So I'll try and represent some, if not many of us while I'm
15 here. And I'm really glad to hear producer comments on
16 sacrificial pastures, fences, and water issues. I think they
17 know much better than we know about the effect that that's
18 going to have.

19 But I'm here to thank you for the opportunity to have a
20 rule to comment on and to express that I do think that
21 certifiers have been part of the problem in that for awhile
22 now. And the reason why we are in this is because we have
23 allowed ourselves to get backed into a corner, as you

1 mentioned earlier, and because we didn't necessarily feel
2 that we had the authority of the NOP to do the kind of
3 enforcement that we would like to do. And I feel this is a
4 step in the right direction, showing us that we have the
5 support from the NOP.

6 With that being said, I have some major concerns with
7 the regulation as it's written right now. We are still drafting
8 our comments, and they will be submitted to you prior to the
9 deadline, which we will ask again verbally to be extended so
10 there will be additional time to comment.

11 MR. MATHEWS: And how much time do you want?

12 MS. ALLAN: We have requested 30 additional days.
13 It would be fine to do 60 days. We don't need it to be much
14 longer than that.

15 MR. MATHEWS: What about 45?

16 MS. ALLAN: Forty-five would be great.

17 MR. MATHEWS: Some wanted 60, some wanted 30.
18 Maybe we'll compromise.

19 MS. ALLAN: I wanted to say number one, I think it's
20 very important that the origin of livestock wording into this
21 rule is not an effective thing to do at this time. I think as Dan
22 put it, it needs to happen later in its own piece of legislation.

1 MR. MATHEWS: Yeah. And just on that topic, I still
2 would like to receive some comments on that. Because we
3 are wrestling with the proposed rule. I think that it does go --
4 the issues go a little farther beyond what the board had
5 recommended. I think there's things that need to be
6 considered, such as the board's recommendation was that if
7 all -- once you got certified, all animals to be organic from
8 the last third of gestation. Well, what happens in the case of
9 your neighbor who's trying to sell his herd because he wants
10 to retire, and he has nobody to pass on to? And his animals
11 were converted under the 12-month rule. And if we had a
12 rule that says everything has to be the last third of gestation,
13 that would mean that that converted animal wouldn't be able
14 to be sold to his neighbor. And that's not addressed in any
15 of the board's recommendations.

16 There's also the issue of the breeder stock. Breeder
17 stock is defined under the regulation as being a female
18 animal. Well, if you went with all animals have to be last
19 third of gestation, and you brought in breeder stock on that,
20 that would mean that the -- the animal would have to be last
21 third of gestation.

1 So there's a few things that we're wrestling with that
2 we're kind of hoping this little piece will stimulate something
3 outside the box and we'll get some additional comments.

4 MS. ALLAN: Absolutely. CCP is currently enforcing a
5 one-track system. We're currently enforcing a one-track
6 system in which all animals must be organic the last third of
7 gestation. And the issue that was just mentioned of
8 somebody wanting to sell their entire herd does come up.
9 And, you know, we're open to regulations that allow for the
10 sale of a transition herd or something like that. But it needs
11 to be applicable to all producers, no matter how they
12 transition, when they transition. So I just want to put it out
13 there. We think it's completely unfair whether it's two tracks
14 or seven tracks, multiple tracks. So -- and we'll be
15 submitting comments on that.

16 MR. MATHEWS: Yeah. And one of the other things,
17 that is, that the recommendation that the board made, we
18 still believe that it only addresses the exception to the
19 exception, and that's a problem. So we need to go in and
20 rewrite it from that first exception not the second exception.
21 So --

22 MS. ALLAN: The other issue that we do want to
23 quickly address is the effect on the producers. And we're

1 really concerned that this was, like was mentioned before,
2 only put out there as a dairy issue addressing dairy. And we
3 want to be sure the producers are taken into account. And
4 we think there should be a time allowed. And we
5 recommend calling the period one-fifth of an animal's life,
6 breeding, and date and size to do that finishing. So that's
7 one thing I've seen in the comments.

8 The last thing I will say, that there are many parts of
9 that regulation that, while producers have a hard time, they
10 need to implement. I think we have a fair ability to enforce.
11 The regulation is meant to give us teeth. Things like the 30
12 percent requirement. You may not know how to calculate it
13 on the ground, and I don't know how to enforce it, because it
14 will always be estimates, and it will be number of animals
15 eating a certain amount of feed that changes daily.

16 So I think that looking from a noncompliance level of
17 things, they're based on estimates, doesn't give us any
18 enforcement capabilities. If somebody gets 29 percent from
19 their dry pasture, I can't imagine giving them a notice of
20 noncompliance. And for that, there's no way to prove that.
21 And if I can't enforce anything on it, there's no reason having
22 it in the regulations.

1 So I'm also concerned with some of the effects on
2 small farmers. I'm very concerned what I see as the
3 opportunity to allow feed from \$5,000 and under producers
4 appears to be going away based on the way the regulation is
5 written.

6 MR. MATHEWS: I would say it was never allowed.

7 MS. ALLAN: And I would disagree. But okay.

8 I do think there are -- some of the recordkeeping
9 issues that were brought up do disproportionately affect all
10 farmers. And the systems don't take those into account. To
11 assume that there won't be financial impact is incorrect. So I
12 would ask that that be looked at more closely.

13 And the other thing that keeps occurring to me is that,
14 we talk about this a lot here in California, is our regional
15 areas. I know in other listening sessions, people are
16 concerned about their regional area. But it does occur to me
17 that that regulation would affect not just U.S. producers, but
18 any producer in the world that wants to ship organic product
19 or organic feed or feed product into the United States. And
20 we need to make sure that we don't create a regulation that
21 is tied to regional issues, or even international issues that
22 make it impossible to produce in other countries. And I think

1 it can be very easy to have that small vision. And I want to
2 make sure that we're keeping a big picture vision.

3 MR. MATHEWS: That's the challenge that we face.
4 The name of the organic program is really not representative
5 of what we really are. We are a world-wide program. We
6 are the market that everybody wants to come to.

7 MS. ALLAN: All right. Thank you.

8 MS. HOWE: Hi. I'm Belinda Howe from Chico State.
9 And before hearing everybody's comments, I just had some
10 questions about if this passed, and a clarification.

11 So, like, hypothetically let's say my growing season
12 was 365 days and my cows received 90 percent of their dry
13 matter for three months. Then do I fall under the standard?
14 Because 90 percent for three months is equivalent to 30
15 percent for 12 months. So would I –

16 MR. MATHEWS: You would comply. Because it's 30
17 percent over the actual growing season is the way it's
18 proposed. So if you were high on one day, low on another
19 day, we're taking an average over the entire growing season.
20 Because we do expect that there would be times when you
21 wouldn't be able to hit the 30 percent. But you might be
22 hitting 50 percent or 60 percent on a given day. So yeah.

1 But it is as an average over the entire growing season as it's
2 currently proposed.

3 MS. HOWE: Okay. And also, if I don't have -- so my
4 supplemental 70 percent, say, where am I feeding that to my
5 cows if I'm not allowed to use a feedlot or a dry lot and that's
6 what I have to -- I have to build another designated area to
7 feed my cows?

8 MR. MATHEWS: Excellent question. That's an
9 excellent question. Good question. I don't know the answer
10 to it. I have to consider that one a little bit.

11 MS. HOWE: Okay. And also, if I had more than one
12 string, like if I had 1,200 cows, and I bring them up in time to
13 eat their supplemental feed while another string is being
14 milked, is that against the rules to have them in a dry lot or in
15 the designated feeding area while others are getting milked
16 eating the supplemental --

17 MR. MATHEWS: Run the question by me again.

18 MS. HOWE: I bring up strings one through seven per
19 day. So if I have string one up being milked, can I bring my
20 second string up to be fed?

21 MR. MATHEWS: Yes.

22 MS. HOWE: But they're --

23 MR. MATHEWS: Yeah. But --

1 MS. HOWE: -- in the confined area.

2 MR. MATHEWS: We weren't intending to prohibit
3 animals from eating at the time that they were -- prior to
4 milking or immediately following milking. That was not the
5 intent. So we always intended for them to be able to eat.

6 MS. HOWE: Okay. So it would be -- would that be --

7 MR. MATHEWS: So, I mean, I guess it's parsing the
8 definition of feedlot versus bringing the animals up from the
9 pasture allowing them to eat their grain just prior to being
10 milked or just after being milked. And that probably goes
11 back to your other question. I mean, our intentions were
12 never to stop people from feeding grain to the animals at the
13 time of milking.

14 MS. HOWE: Okay.

15 MR. MATHEWS: And I said at the time of milking,
16 and I got a strange look. I meant before they were actually
17 on the machine or after they were on the machine.

18 MR. BOERE: John Boere from Modesto and fourth
19 generation -- I don't know how many generations dairy
20 farmer.

21 How many -- THE REPORTER: I can't hear you.

22 MR. MATHEWS: Speak into the microphone.

23 MR. BOERE: John Boere from Modesto.

1 How many comments did it take to write this? Letters
2 and e-mails and comments from the consumers?

3 MR. MATHEWS: How many comments did it take to
4 write it?

5 MR. BOERE: Yes.

6 MR. MATHEWS: I think that's the one where we've
7 got over 80,000 comments already.

8 MR. BOERE: So this is not dairymen picking on
9 dairymen. And I watched the LaFarge meeting. The little
10 dairies in Wisconsin do not think they can do this, and they
11 don't want to do it. And they say this will put the little dairies
12 in Wisconsin out of business plus the big dairies. And if the
13 consumers want this, they need to pay us for it. And it
14 needs to be -- and the Safeways and some of these big
15 groups in here do not want to pay us a fair price for our milk
16 today, let alone pay us for this.

17 And I don't think it's right. I lost \$2.17 100-weight last
18 year. And it's because of trying to do everything the right
19 way. Environmentally, feed-wise, organically, and
20 everything else. And I just don't think it's right that you guys
21 try to cram this down our throat, because we're not getting
22 paid for what we're doing now, let alone doing this.

1 Another thing. I know my dairy has been inspected
2 by the federal guys. I had two guys from Washington, DC.
3 I've had Lee Green on my place two or three times.
4 Stanislaus County inspected me. I had surprise inspections.
5 Try to tell me -- I think the reason they come to my place is
6 because they know we're doing everything okay. It's real
7 easy to write. And I asked some of the neighbors, and
8 they've never been inspected by some of the names that I
9 just named. I think you guys need to do your job. Inspectors
10 need to do their job and let us alone. You know. If we're
11 doing it wrong, let us correct it. I don't think we need this.
12 And I don't want to comment on the things, because it's
13 already been commented on. And I did send you a letter
14 already. But I think we need common sense, and there's no
15 common sense here. Thank you.

16 MR. MATHEWS: Anyone else? We've still got time.
17 And I'm willing to stay beyond time. If you have a question,
18 you'll --

19 MS. DEJONG: My name is Leanne DeJong. And we
20 have an organic dairy farm in the eastern part of Oregon.

21 MR. MATHEWS: I remember you. I saw you in
22 Boulder.

1 MS. DEJONG: Right. Correct. And we are just like
2 the last speaker. Third generation here in the United States.
3 But I was born and raised in Holland. And I don't know how
4 many generations we have there. Both my mom and my
5 dad are from the dairy background. I didn't come here with
6 any prewritten comments. I just want to say a few things.

7 First of all, dairyman is a special species. And the
8 reason he's a dairyman because he loves cows. And if you
9 want to see somebody work hard, it's not because we are
10 dairymen. But they put in a lot of hours. And they know if
11 they take care of their animal, the animal is going to do
12 good. So if they don't take care of their animal, they may as
13 well go out of business. Also, they don't mind paperwork at
14 all.

15 And so this rule with only in it is in some way good.
16 But on the other hand, it is really tough for dairymen to get
17 through -- fill another set of paperwork, go back over all the
18 extra requirements. I think it's very cumbersome for the
19 dairymen to fill this.

20 It is also cumbersome for the certifiers, because they
21 have to know what is 30 percent. It's an estimate. It leaves
22 the door open for people to not be quite honest. And so I

1 don't think that you're going to realize what you're after with
2 the access to pasture.

3 And so I am in agreement with Dan the nutritionist.

4 And I forgot his last name. Right there. That we will -- we
5 look to a similar rule where there may be cows per acre, and
6 you can make sure that this pasture is pasture. Well, that's
7 where the certifiers come in and look. This gentleman said
8 anybody that knows anything about grazing and pasture,
9 they can walk on a dairy and they can see whether you're
10 grazing your cows or whether you're not grazing your cows.

11 And I think in that instance, you're talking about a few people
12 that are trying to push the limits. But most of the dairymen,
13 when they graze, they know what they're doing.

14 And one last thing that I did want to say, and it was
15 mentioned already before, but I want to reiterate, the
16 consumer, they want to see cows in pasture. But they would
17 be very, very disappointed if they see our cows where they
18 live in sacrificial pastures. That would impose many, many
19 health threats. And I don't think any consumer would be
20 happy with that situation. That was it.

21 MR. MATHEWS: Cindy?

22 MS. DALEY: I have been really busy this week, so I
23 don't have anything real formal prepared. But I really

1 appreciate no sharp objects today. And you left all the guns
2 at the door. I really appreciate that. We were wondering if
3 we were supposed to hire a bouncer or something along
4 those lines. But it's been really mild, and we appreciate it.

5 I'm Cindy Daley. I'm with the College of Agriculture,
6 and I'm responsible for the organic dairy program on this
7 campus. And we've had a lot of help from almost everybody
8 in the room. So again, thank you for being here. And I
9 wanted to say, we're here to support the family farm. And
10 we think that it's really important that we work towards a
11 level playing field, however that plays out. And we also
12 support pasteurized dairy production, because we think it's a
13 very viable way in which to make milk. And we certainly
14 think it needs to be included in the organic label.

15 Some of our concerns we've had, as the dairy
16 management team has discussed a lot of this ruling, is that
17 there seems to be a huge variation in the way in which the
18 NOP is being enforced. And we think that part of that is
19 what the USDA is trying to address. And so we really
20 appreciate that, and all of the time that you guys have taken
21 in order to try and redraft this in order to do that. Take the
22 loopholes out and try and make it a level playing field. So
23 we think that's a great deal.

1 How we make that enforceable, that's the real
2 problem. 120 days/30 percent 0116 is a number that's been
3 thrown around. Difficult to enforce. Difficult to back up.
4 Wondering if maybe what we need to be looking at is
5 contingents within the milk. Maybe the bulk tank is really all
6 the proof we need, if we could actually analyze contingents
7 within the bulk tank that would reflect and correlate the level
8 of core rotten waste. Perhaps there's other components that
9 we haven't considered yet that would be a real easy way for
10 verification. It would basically take the onerous process of
11 trying to do the 70/30 off the producer, and it would be there
12 in the bulk tank, just as we're doing our milk quality checks
13 on a regular basis.

14 So I would throw that out there as something we
15 might want to consider down the road. I think Robin really
16 hit it on the head. If we can't enforce this, it's going to be
17 impossible and a big waste of time to spend a lot more
18 energy on this kind of a measure. We want to see it -- we
19 want to see a level playing field. We want to see pasture as
20 a requirement for organic dairy production. And we're there
21 to do whatever we can to help USDA and the organic dairy
22 producers in this area.

1 So with that, thanks. I appreciate being here. And if
2 anybody needs a tour, we've got lots of students that would
3 like to give you a real quick 25 cent tour.

4 MR. MATHEWS: Well, I definitely want a tour before I
5 leave. Anyone else?

6 MR. McGLOCHLIN: Yeah. It's Gary McGlochlin
7 again. It just came to mind talking about the two-track
8 system for the cows. Whatever we do there should have a
9 sunset clause, because there can't be 80/20 conversions.
10 So the two-track system has to do it within a 12-month
11 conversion of the herd. So it should be a sunset clause so
12 we're set up all the same. Because the cows aren't coming
13 forever, so we do come together on track.

14 MR. MATHEWS: Actually, the 12-month conversion
15 is a provision that was in the statute. And what has been
16 recommended by the board is that it would only be available
17 to new entrance into organic. In other words, if you had a
18 dairy farm, you had 100 cows or whatever and you wanted
19 to become organic, you would be able to convert those
20 animals. But once you got certified, that opportunity goes
21 away. So the proposal has been all along that the
22 conversion of conventional animals, only a one-time deal per
23 operation, would continue. And that's based in the statute.

1 MR. McGLOCHLIN: But would those -- would those
2 herds themselves then have a five-year window and then be
3 on the same track for a reasonable time, since most of the
4 cows will have been born in the organic program by then if
5 they're not forever in a separate track as all the other
6 dairies?

7 MR. MATHEWS: Well, they would be in the track
8 until they were out of their usefulness as a milking animal.

9 MR. McGLOCHLIN: Right. So they wouldn't come
10 together. Is that right?

11 MR. MATHEWS: On that one operation. Eventually
12 they would only have last third of gestation animals because
13 of the die-off --

14 MR. McGLOCHLIN: Right. But the rules --

15 MR. MATHEWS: -- or slaughtering of the originally
16 converted animals.

17 MR. McGLOCHLIN: But the rules would all be
18 different for that dairy, then.

19 MR. MATHEWS: Only until those animals were all
20 used up for whatever reason.

21 MR. McGLOCHLIN: Okay. And I just want to make a
22 comment. I'm more interested in Chico State now that my

1 kids are getting older, because they seem like the sharpest
2 people here.

3 MR. MATHEWS: You really liked that question, didn't
4 you?

5 MR. STUEVE: Hello. My name is Gage Stueve. My
6 mom and dad and brother and sister and I are dairy in
7 Oakdale, California. And I wanted to thank you for coming
8 out and giving us the time out west. I always feel like
9 Washington, DC is so far away from where we're at in the
10 west. And I appreciate Cindy for having us here in this
11 venue and being able to get us all organized together in
12 some fashion to at least talk over all the potential changes.

13 And we come from a multi-generation dairy farm as
14 well. And we've dairied in different ways and different
15 reasons. We had some dairies in Southern California that
16 our family had been involved with. And then we also, in the
17 '80s through into the '90s, were seasonal for about ten
18 years. And that was pretty organic for us. We weren't
19 organic at the time. When we were seasonal, we didn't have
20 any infrastructure other than just a place to supplement
21 during the spring and the fall, and then we dried them off in
22 the winter.

1 And then organic came along in the mid '90s, and we
2 joined with Tony Azevedo and a few others, some here,
3 some not. Got involved in the organic. And we needed
4 year-round supply, so the seasonal didn't work at the early
5 stage of the game for us. So we started to -- to think about
6 building a place that was suitable for year-round organic
7 dairy production. So we started that process in 2003.
8 Finished by 2005 with the dairy site center of the pasture.

9 Our pasture is our resource. Our biggest resource
10 alongside with our water. And we designed a system that
11 basically is centrally located and has pastures around it, and
12 we were set up for year-round grazing. And like some
13 people were saying about the economic times. It is
14 challenging economic times. Last year and this year are
15 probably some of the hardest times that organic dairies have
16 been faced with in the last dozen years that we've been
17 involved in organic. And it's a time when you don't have
18 room to make as many mistakes.

19 And we felt like with our -- even though pasture is our
20 resource and that's what we believe in, we have to go
21 through the winter. So we have to feed cows and we have
22 to have a place suitable to feed them and house them. And
23 not only are we located in the central valley, it's a hard area.

1 Can be warm. It cools down at night. But if you were further
2 south, it doesn't even cool down at night. So we've come
3 into times during the -- I call it your growing or grass grazing
4 season what it's not only wet or it's the heat.

5 So you can really -- and as soon as a cow loses milk,
6 you don't ever get that milk back until she has another calf
7 and you go through another year. And so during times of the
8 early years of the organic, in my opinion, there was times
9 when if you did give up that milk, you didn't have that
10 infrastructure to protect them as much or take care of them
11 as much, you were okay, because there was the ying and
12 the yang that worked at that time.

13 Now I feel if you're going to feed through the winter --
14 I have some examples. In 2004, our feed costs per winter
15 feeding was \$3 or \$4 a cow a day. Well, right now our feed
16 costs for the winter feeding is \$7 or \$8 a cow a day. So you
17 can say in four years, things were doubled. And what is the
18 future of the costs, we don't know. Hopefully there are
19 downtrends. But you don't know. And the laws change
20 slowly. I notice it takes a long time until we set some things
21 in stone here. And now we're going to -- and so I want to
22 make sure that whatever we do, of course, works as well.
23 Couple of other things.

1 Let's say for instance today, in our operation, we
2 average probably over the 120 days a year. But today is a
3 growing grazing day. It's December. Where our farm is,
4 there's grass, and it's probably growing. But that grass is not
5 maybe as nutritious as we'd like for it to be. We had new dry
6 grass seeded in and it was very high grain and nutritious to
7 be able to support a lactating animal at that time. But with a
8 little weather or whatever comes along -- let's say the
9 certifier comes today and says, "Well, grass is growing. It's
10 grazing season. Your cows are in why?" And I'm going to
11 say, "Well, I've got now 120 days minimum." I'm going to go
12 out and graze every day I can that's profitable. Because
13 now it's sustainable. Trying to figure out how to make it work
14 and not lose a ton of money is what the goal is, in my mind.

15 And so the way I see it is with the high feed costs,
16 and if we're out there and we would start to lose our milk, we
17 know our feed costs through our winter feeding system is \$7
18 or \$8 a day. Remember, after you lose that milk, your cows
19 don't come back until the next calf. And so, you know, even,
20 like, with nutritionists, if you jump in and jump out of
21 pastures, or it's wet today, it's dryer tomorrow. Whatever the
22 situation is. Cows don't like changes that fast. They like
23 consistency, in my opinion. And I think the nutritionists

1 would agree to consistency. And you can trend into a
2 grazing season.

3 And then sometimes, like in our situation, what we do
4 is through the winter, we do a lot of feeding. And then
5 there's certain times in the early spring where we can start
6 out with a few groups. And then from there, in the spring, we
7 add all the groups. And then we transition all the groups into
8 part of the groups through the hot summer. And then
9 through the fall, part of the group is back into the feeding
10 system. So it has to be kind of -- you don't want to make it
11 so choppy that it's going to affect, basically, our livelihood.

12 And one other little thing that we've -- you know. With
13 the shade. Right now, we have essential shading systems
14 around our dairy. You know. A place where we feed and we
15 have shade. And we flood irrigate, for instance, where we're
16 at. And if you flood irrigate, you have to have checks. And
17 you mess up the integrity of the field when you don't do
18 gates right. And we want to make sure that during hot
19 weather and things that you can take care of the livestock
20 and not try and cost us to build more things in fields where
21 you're taking away from your production of the grass
22 species, plus causing wet spots and other things that get the
23 cows dirty and those sorts of things.

1 And I guess I've read through our group's NOPA, food
2 farmers. And there's probably a few things in there for our
3 own family farm that we would revise that I'm going to talk
4 with NOPA. And they've worked a lot harder on it than I
5 have. But I mean, like, you know, if it's set up to go the way
6 that is planned, it looks like a wreck, in my opinion. And
7 hopefully, we'll be able to come to some terms. And -- I think
8 that's about the story.

9 MR. MATHEWS: Okay. I wanted to make one
10 clarification, unless I misheard you.

11 There actually is no 120 day provision within the
12 proposed rule. I mean, that was a recommendation, but it's
13 not in there. What we have said is the growing season. The
14 growing season tends to be 121 days to 365. So we never
15 adopted the 120. So to think that you can go out and graze
16 for 120 days and not the rest of the time in an area that has
17 a growing season of 365 would be wrong. Because you
18 would be actually required to graze for the full 365, just as a
19 point of clarification.

20 MR. STUEVE: Well, in my opinion, that's not fair.
21 And the reason it's not fair is that we do have a winter and a
22 summer growing season. I mean, there's -- we do get some
23 frost. Like over on the coast, where some people over on

1 the coast spoke, they don't get frost. But then, of course,
2 they have dry land. Some of them have irrigated. I don't
3 know their situation. They're on the coast. I'm just figuring
4 out -- I have enough trouble figuring out what we do in the
5 valley where I'm at. But we do have the growing season.
6 But the facts are the nutritious grass is about the same time
7 as a farmer -- that would be the same time where there's
8 snow or frost through the winter. Nutritious grass period is
9 probably similar to that. And that would be, you know,
10 milking, grass species, you know, the right time and the right
11 stage.

12 And so if you're going to expect us to be -- like today.
13 Like today, we're grazing today. We're grazing our livestock.
14 We're grazing our heifers. We're grazing -- just up to a week
15 ago or so we were grazing some of our later lactation cows.
16 But our other higher producing cows, we lose milk. And I
17 saw in the provision that it's not inclement weather if you're
18 losing milk. But you got big bills. And we're just trying to
19 figure out a way to do it. But doing something 120 days or
20 whatever, or frost to frost, what -- just say it again exactly.

21 MR. MATHEWS: The growing season is defined as
22 the last frost in the spring and the first in the fall.

23 MR. STUEVE: Yeah.

1 MR. MATHEWS: And that's really the determination
2 of how long you would graze in the proposal –

3 MR. STUEVE: Yeah.

4 MR. MATHEWS: -- is during the growing season.
5 And if that is 365, then you would be expected to graze 365.

6 MR. STUEVE: I don't think that that's fair for the
7 national. Because, you know, you could be in the
8 Caribbean, and grass this tall, and the cows are starving,
9 you know, because it's just growing fast. It's not nutritious.
10 It's just -- you know. Like, for instance, where you go frost to
11 frost, the -- the grass that's there that comes on in spring is
12 very strong and it has a strong growing run. And then it gets
13 frost and dies off. So the grass that's out there isn't very
14 nutritious, in my opinion. Where there's a longer grazing
15 season, I feel like there's potentially times when the nutrition
16 of that grass at the end and at the beginning and sometimes
17 during the hot weather is challenging. So thank you.

18 MR. MATHEWS: And that's why we were talking
19 about an average of 30 percent over that time instead of in
20 part.

21 MR. STUEVE: Then that gets back to putting it onto
22 the certifier. And the day that they come, you know, they're
23 going to question the bookkeeping paperwork. We've got a

1 ton of paperwork as it is. And we're with -- with you to want
2 to make the laws so that we don't have people breaking our
3 philosophy in this pasture grazing system, pasture-based
4 theory. It's just we've got to make it so that it's palatable
5 somehow. Thank you.

6 MR. MATHEWS: Thank you.

7 MS. BURROUGHS: Good afternoon. I'm Rosie
8 Burroughs. I just want to make one small comment. In this
9 last discussion about growing season and grazing season,
10 and while we may have a growing season that is defined by
11 frost, there's also, in our area, fog. And so we could be in
12 the growing/grazing season and not be having grass growing
13 because we've had as much as 30 days, consecutive days
14 of fog. And grass doesn't grow without the sun. So I just
15 wanted to point that out to you in our area. Thank you.

16 MR. MATHEWS: Thank you.

17 MR. KNUTSON: My name is John Knutson from
18 Modesto, California. I just want to comment about the
19 grazing system. And from March, April, May, June and the
20 middle of July, we have excellent quality feed in our grass.
21 But we get into the heat, and we get over 100 degree days,
22 even 90 degree days. The grass grows, but the quality is
23 not there. And if you think a cow that is producing 70, 80

1 pounds of milk, you're going to throw her in a negative
2 energy, and she's going to lose weight. And I just think that
3 we're hurting the cows, you know, by doing that.

4 Now, later on in the fall, our grass will start to slow
5 down and quit growing. And, you know, it's possible to put it
6 back on pasture at that time. But I guess what I'm saying is
7 during the last of July, August and September, keep putting
8 this much out, but I don't think they should have to take the
9 whole 30 percent. Maybe they can take 15 or 20 percent of
10 the grass and then give them a little more concentration.

11 Little more alfalfa or a little more silage to try to keep the
12 energy balance up.

13 MR. HUNT: My name is Gregory Hunt. I work for
14 Rockview Farms. We've been certified for about 12 years.
15 And I help manage an organic heifer operation in Modesto
16 and an organic dairy on the California/Nevada state line over
17 by Death Valley. And I help manage an organic milk co-op,
18 buy organic milk, which is a pretty new company.

19 And one comment I have has to do with a lot of
20 others. I guess sometimes the more you hear the same
21 comments, you know you've struck a nerve on something.
22 So it doesn't hurt you to repeat the same comments and
23 concerns. I guess we need a system, in my opinion, that is

1 flexible in managing these different operations that have very
2 different climates, you know. And we are under the same
3 standards, the same rules, and it's been difficult. But I think
4 the new proposed rules are some good things. We need to
5 have a rule that has -- it needs to be something that can be
6 evaluated by inspectors and to be reviewed properly, and for
7 the certifiers to be able to be helpful to the producers. A
8 system that's fair.

9 As a couple of other people have mentioned,
10 profitability is a very big issue, depending on milk prices and
11 feed prices and the economy. One of the big concerns that
12 all of us should have, obviously, is being profitable and
13 having rules that have enough flexibility that each individual
14 farm can do what's right for the animals and also still be
15 profitable.

16 Part of the reason for large organic dairy farms is that
17 the market out there and contracts that are made between
18 producers and users have a need for so many loads of milk
19 per week, for example. And they're trying to fill contracts.
20 And it's very difficult to have swings in production that go
21 down due to the nutritional variability that the pasture part of
22 organic dairying creates.

1 Like some other guys have mentioned, in our Nevada
2 operation, the grass doesn't have at all the nutritional value
3 in July and August that it does in the spring and the fall. But
4 that's not something that you can maybe easily put in rules.
5 Maybe we have another reason why we wouldn't be grazing
6 in the summer, being in that climate, and then the
7 temperature's going to reach 115 degrees. And to put
8 animals out in that temperature would definitely be inclement
9 weather and torture on the animals.

10 And then, it makes us have to consider other things
11 that become cumbersome management-wise when maybe
12 we could put the animals out there at night. But are they
13 really grazing or getting their 30 percent? And if they do,
14 there's maybe drops in production. As Gage Stueve
15 mentioned, once you lose the production on those animals, it
16 doesn't come back until the next lactation. And so that's
17 something that we try to prevent.

18 The other issue I'd like to -- not too many people have
19 talked about this, but it's a pretty big concern for us in the
20 Nevada facility, is that there are no trees. It's just rocks, and
21 one with tall shrubs. And with 40 paddocks and most of that
22 being irrigated with pipets inhibiting equipment, that makes it
23 almost impossible to imagine how we can have shade. And

1 then we have two or three very windy days that would blow
2 over portable shades, which we've thought about doing. And
3 I've heard from others here, Mr. Fagundes, who has portable
4 shades and kind of checks the borders in the pasture.
5 Because the cows take a path to the shade, and that
6 damages the pasture. So that's the way we look at it. If it's
7 too hot, if it's obviously going to be bad for the animals'
8 health, if the sun is too intense, those are just periods and/or
9 times of 0134 the day that we have to avoid grazing.

10 And I didn't really prepare for this. But, you know.
11 Obviously we do a ton of paperwork. I don't think anybody
12 here wants to have a lot of extra paperwork. The 30 percent
13 to me seems fairly impossible to be able to accurately
14 calculate. I think that -- though you just mentioned that the
15 120 days has never really been part of the rule, I think
16 something like that makes sense, because you've -- Mr.
17 Stueve just mentioned it allows flexibility.

18 In our case, we have a pasture season that's optimal
19 for profitability, for nutrition, you know, about 90 days in the
20 springtime. From mid March until mid June before the
21 temperature gets too hot, the grass is more nutritious. And
22 then about 45 or 50 days in the fall. And so I think that the
23 120 days is verifiable for grazing. You can fit your 120 days

1 into the year however you would like for reasons of
2 profitability or nutrition of the grass.

3 And I think that I'm for something more like that than
4 having to have inspectors and reviewers and certifiers to
5 have to, you 0135 know, not fight it, but it certainly, in our
6 case, has required some writing back and forth and so many
7 phone calls and so much writing and documents to defend
8 ourselves about what we're doing and why we're doing it,
9 and we're doing it for logical reasons, where it creates, I feel,
10 a very different environment. Because then I feel for the
11 certifiers, because they're really looking at so many different
12 unique situations. And it makes it very difficult for them to
13 hear all kinds of different stories of why each dairy is doing
14 things their own unique way. But I believe we have to be
15 able to do things in our own unique manner that makes
16 sense for us and make senses for the animals.

17 So my biggest concerns are having such rules that
18 really restrict that kind of flexibility that I think that we each
19 need to have in our own climates, and even in the way that
20 we choose to be most profitable and have consistent
21 production. That's all I had.

22 MR. MATHEWS: Okay. Thank you. So I guess your
23 message is, as the speaker before you, that you really think

1 that the 120 days is more logical everywhere. Rather than
2 120 days, 121 days, whatever, on up to 365, you would like
3 to see 120 days for everybody off pasture.

4 MR. HUNT: I think that's an even playing field. I think
5 maybe if there's an area -- like somebody else had
6 mentioned, maybe in Marin County or Sonoma County,
7 areas that get all the rain at one time, maybe they don't --
8 and they can't irrigate or are not set up to irrigate, maybe
9 100 days isn't possible, you know. And I don't think that I'm
10 the kind of person or that anybody in here should be the kind
11 of person that says, "Well, if I can do it, I'm happy. And if
12 somebody else can't do it, that's their problem."

13 But I don't think it's really fair to have -- for example,
14 in our Modesto facility, we really can't graze 365 days a year.
15 We have way more grass than the number of animals. So
16 maybe 2, 3,000 animals. But we have 3,000 acres of
17 irrigated, plenty of water, and also plenty of rain. It's not a
18 situation there when times of the year the grass is most
19 nutritious or not. These are heifers. So there are times of
20 the year when the grass is less nutritious and the heifers are
21 growing more slowly, so they're going to freshen 20 days
22 later than if we were supplementing them as well as being
23 on pasture.

1 That's -- you know. I don't know if 120 is the magic
2 number. There may be some people that say that they can't,
3 or there may be just certain years that an operation couldn't
4 get 120 days. But I don't think that a certifier would be
5 flexible and realize that the precipitation that year didn't allow
6 for 120 days. And they wouldn't be decertified for something
7 due to things outside of their control.

8 But maybe -- generally, most dairy farmers probably
9 feel that 120 days, or maybe 130 days would be meaning
10 that they -- and the loophole -- I don't know what you do
11 about the loophole where there's a dirt lot called a pasture
12 and the animals are fed there. Obviously that's something.
13 There must be a way to close a loophole like that. I mean,
14 it's evident to an inspector if grazing has been going on. And
15 I think surprise inspections are -- I think it's a very good thing
16 to not know when you're going to be inspected. I think it
17 would be a good idea to have more surprise inspections to
18 keep everybody honest. And, you know, you can't have
19 pastures, I think, that are being mechanically harvested. I
20 don't know how close you can close that loophole. But I
21 think that allows for the flexibility of -- the heifers I think we
22 have it's fine to graze, and it doesn't matter if the grass is

1 less nutritious at the time of year to be able to fit those days
2 in that you see fit in your -- in your unique system.

3 MR. MATHEWS: If we switched from growing season
4 to grazing season, would it even be necessary to have a
5 number of days? If you say grazing season, wouldn't that --
6 would that take care of it?

7 MR. HUNT: I think -- no. There's still -- not
8 everybody mentioned that today. But there's periods when
9 the feed is less nutritious. I don't know. I mean, I can't -- I
10 don't have an answer for that. I think that it still -- it still
11 creates a situation where a guy in Maine or Wisconsin or
12 Texas or California or Nevada has -- from a consumer
13 standpoint, you know, someone can say, "Well, I have to
14 graze my animals 200 days, because my grazing season is
15 longer." You know. And this guy didn't give any grain, and
16 he only grazed 60 days, and yet that grazing, depending on
17 your system, depending on your business, quite often can
18 affect your profitability. So I think that it isn't really an even
19 playing field, just because one guy may have a longer
20 natural grazing season than another guy.

21 MR. MATHEWS: Okay.

22 MR. COELHO: Hello. My name is Frank Coelho. I'm
23 a dairy farmer from Modesto, California, multiple generations

1 also. First off, I'd like to thank you for allowing us to do this.

2 And also Chico State University and Professor Daley for

3 giving us the opportunity.

4 I waited so I could hear most of the comments so --

5 and there were some very good comments today. Brought

6 me up to speed with a lot of other things. Like beef

7 producers. I think that should be segregated somehow,

8 because they do have a different type of operation than us

9 dairymen. But I have one question for you. I was just asked

10 in the event of a national disaster, how would this play into

11 the, you know, to the rule? Would you comply with the rule

12 if, say, there was a national disaster, and the governor of the

13 state deemed a national disaster?

14 MR. MATHEWS: Okay. There is a provision within

15 the regulations for temporary variance because of that kind

16 of a situation. And so if you weren't able to graze for a period

17 of time because of a disaster, then you would be able to get

18 a variance from that grazing period.

19 MR. COELHO: Okay. Also, on the meeting in

20 LaFarge I was watching, you had the meeting there day

21 before yesterday. Lot of discussion was taken up on the

22 bedding issue. I know that doesn't apply to us so much here

23 so much as back there. But I strongly believe that -- I've

1 been organic 11 years now. And everything that comes into
2 my farm, my certifier requires it to be certified organic. We
3 have to -- our bailers, if I custom bail some hay, we have to
4 custom wash custom equipment that comes in because of
5 potential contamination. And from what I herd, people are
6 using conventional bedding.

7 MR. MATHEWS: Well, there have been some. And
8 our position is that the regulations don't allow that.

9 MR. COELHO: Good.

10 MR. MATHEWS: I mean, if it's a conventional
11 bedding and it's something that could be eaten by an animal
12 or eaten by animals, it is not allowed. And the provision in
13 the proposal clarifies that point. I mean, it's never been
14 allowed to bring in conventional bedding that an animal
15 might eat. And that has been happening. And that's why
16 we've proposed the language change to really clarify the fact
17 that you have to have organic bedding if there's a chance
18 that that animal is going to eat it. That's why we went
19 through and give the example of cobs and straw and what
20 have you.

21 MR. COELHO: Okay. Last thing I'd like to say. From
22 all the comments I've heard here today, once the provision
23 comes out, I think it will answer a lot of these people's

1 questions. I think we should support that version. I think it's
2 been talked over by dairymen around the country that have
3 been participating on conference calls with that. And I think
4 it's getting to a very good version of what we could comply
5 with. Thank you.

6 MR. MATHEWS: Please restate your name.

7 MR. KENNEDY: John Kennedy. I'm an independent
8 nutritionist.

9 I have a question this time. And I think the student
10 from Chico State introduced a very good topic. And can I
11 ask a question? What is your intention in the daily control of
12 the animals? Are you requesting that they have access to
13 pasture all day long, 24 hours? Is that the intent of the new
14 rule? You said they can be fed just before milking, just after
15 milking. And the reason for my question is if we have a 30
16 percent requirement on pasture, and that's variable
17 throughout the grazing season, then there are some days
18 when we'll only be feeding 10 percent in the pasture. So we
19 have to get 90 percent of that to feed. And on this, we're
20 allowed to keep the animals in the feeding area for an
21 extended period of time. We can't give them 90 percent of
22 their intake ten minutes before milking and ten minutes after
23 milking. So I don't know that there's any need to put a time

1 limit when an animal needs to get access to the pasture
2 during the day, as long as they get access to the pasture.
3 That's the first question. And I'd like to know what your
4 thinking is on that. In your response to the Chico State lady,
5 you seemed to want them out 23 and a half hours.

6 MR. MATHEWS: Pretty much we want them out all
7 the time. That's in the proposal. If they weren't getting
8 milked or feeding just before or after milking, then they would
9 be outside.

10 MR. KENNEDY: But we're not allowed to bring that
11 90 percent of the feed out to the pasture?

12 MR. MATHEWS: There's nothing in there that says
13 you can't bring the feed out to the pasture. But you're
14 supposed to be getting 30 percent PMI while they're in the
15 pasture. So the problem there would get into would you
16 rather have the candy or the grass.

17 MR. KENNEDY: Right. But 70 percent of their feed
18 they won't eat within a short window around milking time.
19 They physically can't eat all that. So the idea that it's
20 workable that they have to do that within milking time is not
21 practical at all. And then, you know, that's certainly
22 something that -- I don't know if --

1 MR. MATHEWS: Well, that's your -- you're bringing
2 up the kind of issues that we need to hear.

3 MR. KENNEDY: Yeah. And I can't see that working.
4 So as long as we -- as long as we fulfill the requirement of
5 getting the pasture out there into them in whatever we
6 decide. And I think we're all in agreement we need to get
7 more access to the pastures. So it has to be at the
8 discretion of what an animal can physically do. And putting
9 any time limits on when they can be on pasture is
10 unnecessary. I think it's either/or. It's either time out there or
11 quantity fed. You shouldn't have to have both.

12 And the other thing, and Dan Giacomini's idea of
13 stocking rate concept, and the question is what do the
14 consumers want? Don't the consumers think about pasture
15 as exercise and being outdoors just as much as they think
16 about it as dry matter in particular? And presumably --

17 MR. MATHEWS: Well, yeah. They expect them to
18 be outdoors getting exercise and eating the grass, yeah.

19 MR. KENNEDY: Right. But the exercise and
20 outdoors are -- in my understanding of what a consumer
21 wants, are just as important to them as cows getting exactly
22 how much dry matter. So the idea of having them out but
23 not necessarily eating 30 percent doesn't seem to be against

1 what the consumer wants. So if we get hung up on 30
2 percent, you know, we -- we might be not giving the
3 consumers what they want.

4 And the stocking idea of having enough land to give
5 animals enough exercise and enough outside is a bad
6 approach. And it's a approach that's been used very much
7 in the environmental arena, and in the water quality arena
8 and livestock units. It's already a concept that has been
9 established. So has there been any idea from the interaction
10 with the consumers that the outside is very important, or
11 have you thought at all about the livestock unit per acre
12 concept?

13 MR. MATHEWS: Livestock unit per acre concept, we
14 basically dismissed that in the preamble to this proposal on
15 the grounds that the carrying capacity of the pasture is going
16 to be so variable, and so we were not inclined to put a
17 number on it. I guess the real question is, if we did put a
18 three animal unit limit in there, what happens in the case of
19 the pasture that may not be able to sustain that? I can
20 imagine that there will be situations where that would be the
21 case. So they would be overgrazing that land, wouldn't
22 they?

1 MR. KENNEDY: But it works. That would be a
2 minimum. That wouldn't be -- they could have less animals
3 per acre, right? Like operators would have an acre for every
4 animal right now.

5 MR. MATHEWS: I'm afraid, though, that if we said
6 that you could have 3.0 units, and your pasture really
7 couldn't sustain that, that we would indeed have some very
8 difficult times trying to enforce saying that, "Well, in reality,
9 you should have only had one." Because we would have a
10 regulation that says you can have 3.0 units. So we would
11 have to be careful on the wording of that as well. So maybe
12 somebody's got some ideas on how that could be worded.

13 MR. KENNEDY: Not being able to sustain that,
14 though, would be self-defeating. Because you would then no
15 longer be a pasture the following year if you destroyed your
16 pasture. So if you're looking at long term, that is not -- it's
17 self-restricting right there. If somebody puts too many
18 animals -- if three units per acre was too much for a ranch or
19 a farm, then immediately he's not going to be sustainable.
20 So he's cutting his own legs off. So I don't think that's going
21 to be an issue. And again, it's back to what the consumer
22 wants. The consumer doesn't -- I don't understand the
23 consumer to want dry matter intake per acre.

1 MR. MATHEWS: No. They're not thinking of it as dry
2 matter intake. They're 0148 thinking of it as cows eating
3 grass.

4 MR. KENNEDY: Right. And I thank that's where the
5 concept would still allow us what they want. So that idea -- I
6 don't know how late in the game we can introduce an idea
7 like that. But bring it back into the picture. But when we
8 have such a difficult and such a complexity and such a lack
9 of support for this 30 percent concept, then maybe it needs
10 to be thought about.

11 MR. MATHEWS: Well, I encourage you to comment
12 further on that. It's still a viable option. Yes, sir. Please
13 restate your name.

14 MR. HARRISON: Rick Harrison. As far as the
15 pasture management, why does the government need to
16 impose anything? Couldn't it be the pasture management
17 principles which vary from time of year to season to season
18 and year to year? You know. Everybody here is a livestock
19 producer, and they know what's good for the animals and
20 good for the land. And if you find a problem with it, correct
21 that problem. But not everybody else needs the government
22 to dictate how many animals can go on pasture. It varies
23 from year to year.

1 MR. MATHEWS: So I would assume that you're not
2 in favor of a stocking rate.

3 MR. HARRISON: Absolutely.

4 MR. MATHEWS: He said absolutely. Yes, sir.

5 MR. MATTOS: Yeah. My name is John Mattos. I'm
6 a Petaluma dairyman. And I'm not going to go into specifics,
7 really. But I've read a lot, pretty much how they address this.
8 And I kind of -- I support that pretty much across the board.
9 And I don't have too many questions about that. So I wanted
10 to state that.

11 MR. MATHEWS: Okay. Thank you. Anyone else? I
12 was wondering if we were going to have enough comments
13 to fill in the full three hours, and we've actually gone over.

14 Well, if there's no one else, I would like to express my
15 appreciation to Chico State, and Cindy in particular, for
16 hosting this event. And I really appreciate all of you coming
17 here today and taking time away from your business to come
18 here and give me some feedback as to your likes and
19 dislikes on this rule. And we will indeed be taking serious
20 consideration of your comments. And for those of you who
21 would like to follow up with written comments, those will also
22 be appreciated.

1 Again, thank you very much for coming today. I really
2 appreciate it.

3 (Whereupon the proceedings concluded at 4:50 p.m.)

4

1 CERTIFICATE OF REPORTER

2

3 I, JAMIE LYNNE GUILLES, a Certified Shorthand
4 Reporter of the State of California, License No. 8086, do
5 hereby certify: That said proceedings were recorded in
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10 That I am not of counsel or attorney for any of the
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12 cause, and that I am not related to any of the parties hereto.

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A				
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